

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Improving Competitive Broadband Access to)	GN Docket No. 17-142
Multiple Tenant Environments)	
)	
Petition for Preemption of Article 52 of the San)	MB Docket No. 17-91
Francisco Police Code Filed by the Multifamily)	
Broadband Council)	
)	

**COMMENTS OF
SAFER BUILDINGS COALITION**

The Safer Buildings Coalition (“SBC”), hereby respectfully submits the following Comments in the above-reference proceeding.

The Safer Buildings Coalition (“SBC”) is an independent 501(c)4 non-profit that focuses on ensuring that every manner of communication inside buildings that would be useful during an emergency is available and functions correctly, when and where needed:

- The Public must be able to dial and text to 911 and be quickly and accurately located
- Mass Notification Texts must be received
- First Responder Communications, Including Land Mobile Radio and Smartphone / Cellular enabled services must function where and when needed.

The Safer Buildings Coalition is supported by a diverse group of Members representing First Responders, Fire and Building Code Officials, Commercial Real Estate, Higher Education, Healthcare, Manufacturers, System Integrators, Engineering and other related trades.¹

Deployment of communications facilities within buildings is an essential mission of SBC. Such deployments are vital to public safety (both occupant and first responder communications

¹ <https://www.saferbuildings.org/>.

access), and a robust internal communications system enables the establishment of a smart building, which is also critical to the establishment of a smart city. SBC encourages a robust in-building communications industry.

There are numerous parallels in the technology, design, deployment strategies, and business and funding models in use for both commercial *and* public safety in-building enhancement systems and rooftop infrastructure. In many cases, they are functionally identical, may be provisioned in the same physical system installation, and can utilize the same business models and contracts. Business arrangements and/or system deployments may be impossible to bifurcate, especially after installation. Any rule, regulation, constraint, restriction, or requirement placed on one would likely directly impact the other. However, the NPRM does not address or ask questions about the impact of the Commission's potential further regulation on public safety. Therefore, the Commenter urges the Commission to carefully consider and seek further comment on the impact of this NPRM on existing and future Public Safety In-Building and Rooftop systems and contracts before taking any action which could impact the industry.

WEREFOR, it is hereby requested that the Commission act in accordance with the views expressed herein.

Respectfully submitted,

SAFER BUILDINGS COALITION

By: Chief Alan W. Perdue, Executive Director

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