



STATE OF NEW MEXICO
DEPARTMENT OF INFORMATION TECHNOLOGY

MICHELLE LUJAN GRISHAM
Governor

VINCENT MARTINEZ
Cabinet Secretary

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

November 14, 2019

VIA Electronic Filing

Re: *Ex Parte Communication*
Boulder Regional Emergency Telephone Service Authority Petitions, WT Dkt. No. 19-254

Dear Ms. Dortch:

The State of New Mexico, Department of Information Technology ("NMDoIT") strongly supports "full interoperability" between FirstNet/AT&T and other public safety providers. To best serve the public during times of life and death emergencies, it is critical that all first responders in New Mexico have access to the same features and capabilities, regardless of the public safety network to which they subscribe. A more restrictive approach to "interoperability" as advocated by FirstNet/AT&T, will unnecessarily inhibit emergency communications between public safety personnel on different networks and could endanger the public.

Currently, FirstNet/AT&T coverage is insufficient in many parts of this rural State. To help compensate for this situation, public safety personnel in different geographic regions within New Mexico may well elect to operate on other public safety networks. Among other requirements, the level of priority and preemption between users on FirstNet/AT&T and other networks must be standardized to avoid a situation in which a high priority public safety user on one network is treated as a commercial user on another network. This is particularly important in situations where users from different jurisdictions are responding to a common emergency, such as a wildfire within a remote region of the State.

As requested by BRETSA, the Commission should issue a ruling clarifying that "interoperability is a fundamental responsibility of FirstNet" and open a proceeding to develop appropriate interoperability standards to best serve the interests of public safety. By developing a regulatory structure requiring full interoperability, the Commission will be establishing a competitive environment for public safety services in which FirstNet/AT&T will need to expand coverage in rural areas and compete on pricing to gain public safety users as their customers. First responders in New Mexico and across the nation deserve no less.

I look forward to receiving the FCC's support of "full interoperability" between FirstNet/AT&T and other public safety providers.

Sincerely,

A handwritten signature in black ink, appearing to be 'VPM' or similar, written in a cursive style.

Vincent Martinez
Cabinet Secretary and Chief Information Officer
New Mexico Department of Information Technology