



STATE OF MISSISSIPPI  
WIRELESS COMMUNICATION COMMISSION

December 6, 2018

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554

**Re: Boulder Regional Emergency Telephone Services Authority's Petition for Reconsideration, or in the Alternative, Petition for Declaratory Ruling and Petition for Rulemaking, PS Docket No: 16-269; 12-94; 06-229; and WT Docket No: 06-150**

Dear Ms. Dortch:

The Mississippi Wireless Communication Commission (MWCC)<sup>1</sup> supports the Petition for Reconsideration, or in the Alternative, Petition for Declaratory Ruling and Petition for Rulemaking (Petition), by the Boulder Regional Emergency Telephone Services Authority (BRETSA), that seeks reconsideration of an Federal Communications Commission (FCC) Order, October 23, 2018, dismissing the July 6, 2018 Request for Clarification filed by the Colorado Public Safety Broadband Governing Body (CPSBGB). In the alternative, BRETSA petitions the Commission to Issue a Declaratory Ruling and a Notice of Proposed Rulemaking on the same grounds presented by the CPSBGB in their Request. BRETSA filed the above Petition with the FCC on November 21, 2018, in PS Docket No. 16-269; 12-94; 06-229; and WT Docket No. 06-150.

The BRETSA Petition again asks the FCC to take action on CPSBGB's request and raises legitimate issues that must be addressed to ensure effective interoperable communications for first responders. Consequently, we ask that the FCC to place the interoperability issues raised again by BRETSA on Public Notice and seek immediate comment.

The State of Mississippi has multiple carriers which provide wireless services to public safety which includes C Spire, AT&T/FirstNet, and Verizon. In fact, Mississippi has Master Cellular

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<sup>1</sup>The MWCC was created by the Legislature in 2005 to serve as the governing body for public safety communications. The MWCC is composed of representatives of both state and local interests which includes the Sheriff's Association, Association of Supervisors, Municipal League, Association of Police Chiefs, Fire Chiefs Association, Department of Transportation, Department of Public Safety, Department of Health, Department of Information Technology Services, Emergency Management Association, Office of Homeland Security, Highway Safety Patrol, Department of Corrections, National Guard, Department of Environmental Quality, and Department of Wildlife, Fisheries, and Parks.

Agreements with both C Spire and AT&T to provide wireless services to both state and local government which includes public safety customers. These carriers offer comparable public safety services including priority while utilizing the same or similar dedicated network configurations. As a result, each network is likely to serve a significant number of public safety customers. Given that communications between these different networks are likely, especially during an event where you have multiple jurisdictions responding to an incident requiring full interoperability between the two networks. Thus, the need for interoperability increases as public safety uses other commercial networks for its communications.

The Competitive Carriers Association “echoes the troubling concerns expressed in the Petition and recent submissions in the record.”<sup>2</sup> For instance, “in Mississippi, both AT&T (through FirstNet) and C Spire offer prioritized public safety services to state and local public safety users . . . it is likely that during an incident in which many jurisdictions or agencies respond, multiple commercial networks will be providing communications services to public safety users.”<sup>3</sup> Hence C Spire agrees with Colorado that there is a need for interoperability, and AT&T/FirstNet appear “to have no intention of establishing standards or agreements with other commercial carriers to ensure prioritized interoperability for critical public safety applications and access.”<sup>4</sup>

Standards or agreements between FirstNet and commercial carriers must be put in place to ensure prioritized interoperability for critical public safety applications and access. Based on the current implementation of the FirstNet network, we foresee a situation where first responders are unable to securely and directly communicate with other jurisdictions, as is currently available on our interoperable statewide P25 LMR networks.

As we unfortunately learned, emergency communications failures during the 9/11 attacks cost first responder and civilian lives. The communications systems of emergency first responders were not interoperable across jurisdictions, disciplines, and networks. As 9/11 showed, interoperability is critical to public safety communications, and ensuring interoperability is one of the primary reasons that FirstNet was established. We urge the FCC to clarify this critical issue for public safety and to release a Public Notice that would allow the entire public safety community to provide input.

Respectfully submitted,



Vicki B. Helfrich  
Executive Officer

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<sup>2</sup> Ex Parte Letter of Benjamin M. Moncrief, C Spire, to Marlene Dortch, Secretary, FCC, PS Docket Nos. 16-269, 12-94, 06-229, WT Docket No. 06-150 (filed July 26, 2018) (“C Spire Letter”); Ex Parte Letter of Michael D. Rosenthal, Southern Linc, to Marlene Dortch, Secretary, FCC, PS Docket Nos. 16-269, 12-94, 06-229, WT Docket No. 06-150 (filed August 7, 2018); and Ex Parte Letter of Robert Morse, Assistant General Counsel – Federal Regulatory and Legal Affairs, Verizon, to Marlene H. Dortch, Secretary, FCC, PS Docket No. 16-269 (filed July 12, 2018).

<sup>3</sup> See, C Spire Letter.

<sup>4</sup> *Id.*