

December 23, 2019

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

**Re: Notice of Ex Parte Presentation, BRETSA Petition
PS Docket No. 19-254**

Dear Ms. Dortch:

The representatives of Southern Communications Services, Inc. d/b/a Southern Linc¹ and Cellular South, Inc. d/b/a C Spire² listed on Attachment A (“Representatives”) met on December 19, 2019 with the Commission staff listed on Attachment B to discuss the Boulder Regional Emergency Telephone Service Authority (“BRETSA”) petition for common-sense steps the Commission can take to protect and enhance communications systems that support public safety.³

The BRETSA Petition asks the Commission to adopt (i) a declaratory ruling that “interoperability is a fundamental responsibility of FirstNet and that FirstNet is supported at all levels including network, services, applications, and devices” and (ii) a notice of proposed rulemaking or notice of inquiry ensuring interoperability between FirstNet and other service providers.⁴ Southern Linc and C Spire strongly support BRETSA’s call to action. Their Representatives explained why these two proposals would ensure that AT&T’s FirstNet can seamlessly interoperate with other land mobile and commercial mobile radio systems, which will give first responders the freedom to choose the products and services that best advance their mission and will reduce the threat of catastrophic communications failures that compromise public safety.

First, the grant of the declaratory ruling represents an important milestone in prompting FirstNet to interoperate with communications systems used by public safety agencies. The ability of multiple

¹ Southern Linc, an Atlanta-based regional wireless carrier, provides an array of mission-critical services, including push-to-talk; voice; and data services throughout Alabama, Georgia, southeast Mississippi, and the Florida panhandle.

² C Spire has provided critical voice and data communications services to Mississippi first responders and public safety officials for decades.

³ Boulder Regional Emergency Telephone Service Authority Petition for Reconsideration, or in the Alternative, Petition for Declaratory Ruling and Petition for Rulemaking, PS Docket No. 16-269, *et al.* (filed Nov. 21, 2018) (“BRETSA Petition”).

⁴ *Id.* at 8.

agencies to communicate and exchange information between applications, databases, and services when responding to emergencies will save lives and protect first responders and the public.

Second, adopting a notice of proposed rulemaking will begin the process through which the Commission can establish clear interoperability standards for public safety communications systems. Without such standards, deployment of FirstNet across the country will lead to situations in which communications systems are no longer interoperable when they are needed most, especially during natural disasters and emergencies. These problems are manifest today and will persist or increase unless the Commission establishes clear interoperability standards under the FCC's authority over non-Federal spectrum under Title III of the Communications Act of 1934, as amended, and under its authority to take all such actions necessary to achieve the Commission's over-arching statutory directives, including "promoting safety of life and property through the use of wire and radio communications."⁵

The Representatives concluded by urging prompt Commission action to adopt both of BRETSA's proposals. Please contact me with any questions.

Respectfully submitted,

Trey Hanbury

Counsel to Southern Linc & C Spire

Attachments

⁵ 47 U.S.C. §§ 151; see also 47 U.S.C. §§ 154(i), 301.

Attachment A

C Spire

Chris Champion, Director, Government Relations

Ben Moncrief, Senior Vice President, Strategic Relations

Southern Linc

Kristin Dial, Manager, External Affairs and Compliance

Hogan Lovells US LLP

Trey Hanbury

Attachment B

Public Safety and Homeland Security Bureau

Alex Espinoza (by phone)

David Furth

Roberto Mussenden (by phone)

Erika Olsen (by phone)

Michael Wilhelm