

movement to new areas need to occur, the unified command should be notified first. Should have taken control of airspace by contacting Dulles Airport. Problems with availability of respirators for VDOT and Police.

- D. Initially confirmed lack of command for site safety at Potomac.
 - E. Problem maintaining open lane at work sites due to tanker truck traffic.
 - F. Lack of equipment can be caused by communication problems. Working on worldwide database to identify all response contractors and their resources.
 - G. Trouble with contractors arriving unprepared, probably due to a lack of communication.
-

Radio Communication During Amtrak/MARC Train Accident

At 1741 hrs. on February 16, 1996, the Montgomery County Emergency Communications Center (ECC) began receiving calls for a reported train accident on the tracks adjacent to the 1900 block of Lyttonsville Rd. in Silver Spring, MD. Silver Spring is located in the southeast quadrant of the County. It was clear from the beginning that a passenger train was involved in the accident and it was on fire.

The initial dispatch of units to the train accident was transmitted on Montgomery County Fire's main operational channel (154.160). Upon arrival of the initial engine units were directed to switch to the primary tactical channel (153.950) and a request was made for a 2nd alarm. The initial dispatch assignment included 1 unit from Prince Georges County. Since this unit is stationed close to the border it is equipped with an additional radio to operate on Montgomery County channels.

As the need for resources increased, an additional alarm was requested and included multiple units from Prince Georges County. A separate tactical channel (fire channel 3) was established. Some of the units that were dispatched to assist did not have Montgomery County or FMARS capabilities. Communications with these units was done by relaying information by direct telephone line to Prince Georges County and they would advise their units what to do.

Medical Sector

The medical sector was assigned to use the channel designed as "EMS-1" (155.340) or fire channel 5. EMS-1 is normally used for hospital consultations. Use of this channel would allow the medical control officer to notify receiving hospitals to expect specific numbers of patients and what their injuries were. In addition, EMS sector personnel used Montgomery County's FEMA Urban Search And Rescue (USAR) team radio cache. These radios allowed EMS personnel to coordinate medical operations on a separate tactical channel.

Supplemental Resources

The ECC Supervisor directed personnel to contact other jurisdictions to advise them of the situation and determine available resources. Fairfax County offered their Multi-casualty response unit and it was sent to Montgomery County Fire Station 10 to stage in the event the number of injuries began to increase. This unit did not have Montgomery County radio capabilities.

Prince Georges County also dispatched their 2 mobile communications units and numerous command officers to the scene to help alleviate the need to relay instructions by telephone.

Simultaneous Alarms

Shortly after the 2nd alarm was transmitted for the train accident, the ECC received a report of a building fire in the east corridor of the county. This is the same general area as the train

incident. The dispatch assignment for the building fire included many units from Prince Georges County as well as Howard County. the mutual aid units from these jurisdictions did have Montgomery County radios.

As operations continued at the train incident, 10 units were dispatched to a multi-casualty motor vehicle accident, again in the same general area of the county.

Station Fill-ins

The magnitude of this incident left much of the lower part of the county without fire and rescue protection. For this reason, the ECC supervisor relocated many units from other parts of the county into this area. Resources were certainly strained so the ECC Supervisor requested units to fill-in from Howard and Prince George counties and the District of Columbia. Again, most of the units did not have Montgomery County or FMARS radio capabilities.

Summary

While most of the mutual-aid units that responded to the train accident in Silver Spring on February 16, 1996, had the capability to operate on Montgomery County channels, some did not. In addition, most of the mutual-aid units used for other incidents and station fill-ins did not have Montgomery County or FMARS radio capabilities. This is due mostly to the fact that the jurisdictions involved operate on different radio bands or the equipment that have is not capable of having additional radio frequencies added.

This incident did not escalate into a major disaster. Command was kept relatively modest. The fire & rescue operations were handled using 5 radio channels. Communications between other fire (mutual-aid) police and non public safety agencies were handled on additional 4 channels. Had spectrum been available to allow interoperability between all agencies involved, 9 channels would have been used for the train accident alone. In addition, 2 interoperability channels would have been used for the simultaneous incidents and station fill-ins.

Radio Channels used during Amtrak/MARC Train accident

Fire Channel 1	Tactical - Main incident
Fire Channel 2	Main Dispatch, updates
Fire Channel 3	Tactical - Lyttonsville Rd sector
Fire Channel 5	EMS Control
FEMA Channel 4	EMS Tactical

Fire Channel 4	Tactical (HazMat, County Environmental Protection)
FMARS-1	Mutual-Aid, directions, dispatch, secondary incidents
Police Channel 3	Main Dispatch
Police Channel 6	Tactical

IV. TOMORROW

The committee determined the spectrum needs to successfully implement the Mutual Aid Plan in order to respond to a disaster similar to Air Florida in today's environment. These needs are given in the letter which follows.

FAIRFAX COUNTY
FIRE AND RESCUE DEPARTMENT
4100 Chain Bridge Road
Fairfax, Virginia 22030

Glenn A. Gaines
Fire Chief

James Downes
U.S. Department of Treasury
Washington, D.C.

I have attached an assembly of materials related to EMS management of a major event. I tried several methods to assemble the information that you need to proceed, and it is difficult. Each incident is different, and there are so many variables that I cannot put together a typical event. I will use Air Florida, with the following understood.

1. I will include a survivability factor to illustrate the Medical Command tree.
2. Remember that there were two geographic sites for Air Florida, the river and the bridge. This would entail a separate sector of operations and EMS, so tactical channels would be doubled for extrication, and all of the EMS sectors.
3. Ideally, units with like responsibility would operate on one common channel. I made no attempt to try and describe the intricate "patching" network that would be required today to make this incident command system work with existing resources.
4. A note to qualify tactical channel assignments. When I identified a group for a tactical channel, that channel would be used to communicate with members of that work team. (For example, if the logistics supply group would receive orders from command to obtain a crane for rescue, the logistics group would work as a team to identify/locate one, have it dispatched to the incident, escorted by police through traffic, let through the security perimeter, and sent to command for Assignment. This requires coordination from several people and a tactical channel is necessary.

<u>Commander/Sector</u>	<u>type channel</u>	<u>Interfaces with</u>
Incident Commander I/C	repeated	Controlling Jurisdiction Dispatch, Operations command, EMS command, Liaison, Logistics
Liaison	repeated	I/C
Law Traffic	tactical	Liaison
Law Evacuation	tactical	Liaison
Law Security	tactical	Liaison
Investigations	tactical	Liaison
Federal agencies	tactical	Liaison
Safety		I/C Operations, EMS
Information		(monitor only)
Operations Commander:	repeated	I/C, EMS, Fire Suppression, Rescue, River, Hazmat, Logistics

Fire Operations:	repeated	Operations, EMS, HazMat, Logistics, River
Fire Suppression Sector	tactical	Operations, EMS, HazMat, Logistics, River
Extrication Sector	tactical	Operations, EMS, HazMat, Logistics, River
River Rescue Sector	tactical	Operations, EMS, HazMat, Logistics, River
Hazardous Materials		Operations, EMS, HazMat, Logistics, River
Entry	tactical	HazMat
Decontamination	tactical	HazMat
Access / Control	tactical	HazMat
Staging	tactical	Operations, EMS, Logistics
EMS Commander	repeated	I/C, Operations, Triage, Treatment, transport, Disposition, Logistics
Triage	Tactical	EMS command, triage, officers extrication, treatment
Treatment	Tactical	EMS command, triage, extrication, disposition
Transport (1)	Tactical	EMS command, disposition, staging, treatment
Disposition (1)	Tactical	hospital, treatment, air group, EMS command
Air Operations (1)	Tactical	air traffic control channel, disposition, hospital
Interhospital (1)	repeated	Communications between hospitals to balance patient load and ensure hospitals are prepared to handle appropriate patients.
Logistics		
Supply	Tactical	EMS command, Fire operations
Medical Support	tactical	EMS command, treatment, inter-hospital
Apparatus Support	Tactical	Operations, Fire operations, EMS command

(1) The number of sectors for fire suppression and rescue depends on the fire, number of attack teams, and complexity of fire operations. Air Florida being in a river without a fire involvement, minimized the need for suppression sectors. However, a land based crash could demand many additional sectors depending on location and number of buildings involved.

Participating COG Fire and Police Agencies involved:

Listing assembled during meeting. Ideally, all EMS units and Fire Units should operate on common frequencies.

Federal agencies

- NTSB Law Investigations
- FAA: Law Investigations
- USCG: Fire Hazmat
- EPA: Fire Hazmat

Communications Requirements

Total Tactical: 20 (excluding bridge sector)

Total repeated: 5

As a final note, we have identified a COG strike team to plan for the impact of a terrorist attack in the Washington, D.C. area. Using SARIN gas event in Tokyo as a model, and setting it at METRO Center, that gas would spread to several adjacent subway stations with thousands of victims. We can't begin to plan a communications network for an exercise of this magnitude, but it does identify that there will be several major events in close proximity. The ability to communicate will be drastically reduced if we do not seize the opportunity to create mutual aid channels for interoperability and develop disaster plans for their use.

This is my thought process using the incident command materials that I have attached. I could be available to discuss any of this further if necessary.

Sincerely

(signed) *Paul A. Nichols*

Communications
Fairfax County Fire and Rescue
4100 Chain Bridge Road
Fairfax, VA 22030

UNIFIED COMMAND COMMAND - SINGLE AND UNIFIED

Command is responsible for overall management of the incident. Command also includes certain staff functions. The Command function within the IMS may be conducted in two general ways.

- Single Command
- Unified Command

Single Command - Incident Commander

Within a jurisdiction in which an incident occurs, and when there is no overlap of jurisdictional boundaries involved, a single incident Commander will be designated by the jurisdictional agency to have overall management responsibility for the incident.

The Incident Commander will prepare incident objectives which in turn will be the foundation upon which subsequent action planning will be based. The Incident Commander will approve the final action plan, and approve all requests for ordering and releasing of primary resources. The Incident Commander may have a deputy. The deputy should have the same qualifications as the Incident Commander, and may work directly with the Incident Commander, be a relief, or perform certain specific assigned tasks.

In an incident within a single jurisdiction, where the nature of the incident is primarily a responsibility of one agency; e.g., fire, the deputy may be from the same agency. In a multi-jurisdictional incident, or one which threatens to be multi-jurisdictional, the deputy role may be filled by an individual designed by the adjacent agency. More than one deputy could be involved. Another way of organizing to meet multi-jurisdictional situations are described under Unified Command.

This figure depicts an incident with Single Incident Command authority.

Expanded Organization
Incident Management - Major Incident

NOTE: *The electronic version of this figure was unavailable at the time this report was prepared. Readers can find the full text of this figure in FCC WT Docket No. 96-86, PSWAC/ISC Document No. 96-04-024/2.*

Single/Unified Command Differences

The primary differences between the Single and Unified Command systems are:

- 1.) In a Single Command system, a single Incident Commander is solely responsible, within the confines of their authority, to establish objectives and overall management strategy associated with the incident. The Incident Commander is directly responsible for follow-through, to ensure that all functional area actions are directed toward accomplishment of the strategy. The implementation of planning required to effect operational control will be the responsibility of a single individual (Operations Section Chief) who will report directly to the Incident Commander.
- 2.) In a Unified Command system, the individuals designated by their jurisdictions, or by departments within a single jurisdiction, must jointly determine objectives, strategy and priorities. As a Single Command system, the Operations Section Chief will have responsibility for implementation of the plan. The determination of which agency or department the Operations Section Chief represents must be made by mutual agreement of the Unified Command. It may be done on the basis of greatest jurisdictional involvement, number of resources involved, by existing statutory authority, or by mutual knowledge of the individual's qualifications.

V. Conclusions

The committee identified a need for 25 channels/RF communication paths to implement the Mutual Aid Plan in today's environment to respond to a disaster similar to Air Florida. This was qualified by factors unique to that disaster.

1. No fire was involved. Additional tactical channels/RF communication paths would be needed to support fire fighting activities. Experience shows that 12 channels/RF communications paths would be required.
2. The disaster area was small compared to that of a western wild fire, a riot, a natural disaster like a tornado or hurricane, etc. Additional personnel, the requirement for many more tactical teams, logistical demands, etc. would require many more tactical and functional communicational channels.
3. FEMA Urban Search And Rescue (USAR) teams were not required in this scenario. However, the Mutual Aid plan must include this specialty. Currently FEMA provides a cache of equipment and radio frequencies in the 406 - 420 MHz band for the US&R teams. This equipment is not compatible with the present mutual aid radio channels. The USAR special teams should be integrated into the Mutual Aid Plan employing compatible equipment and radio channels. An additional 10 channels/RF communication paths are required to support this function.

4. On January 13, 1982 a second disaster occurred involving a Metro subway train. Public Safety agencies from many entities were called on to assist the public. Interoperability is needed. Implementing a second Mutual Aid Plan at a near by location will require an equal number of channels/RF communication paths.
5. Public Safety response to this disaster was primarily a recovery mission. If rescue operations were needed the demand for additional channels/RF communications paths would be required to coordinate the rescue efforts.
6. The U.S. Public Health Service is currently coordinating the development of a Metropolitan Medical Strike Team (MMST) concept, similar to the USAR teams. The MMST's would react to a terrorist inspired event involving biological, chemical or nuclear/radiological agents. The MMST's communications needs will be similar to that of the USAR teams. It is important that a MMST operation be able to communicate and coordinate with local public safety agencies during operations in an event of this type.

VI. Recommendation

In consideration of the above, the recommendation of this subcommittee is for 100 channels/RF communication paths, in contiguous spectrum and paired for repeater access, be reserved for public safety mutual aid operations, for use by any public safety agency anywhere in the nation.

These channels would be used for routine (day to day) mutual aid incident command and control operations, small and large, and for incident command and control of major disasters or major incidents to support multiple agency and multiple jurisdictional response to mitigate these type events.

This recommendation encompasses the current need for voice and data RF communications paths and includes future needs to support new and developing technologies, such as, but not limited to Global Positioning Satellite (GPS) vehicle and personnel location systems and Geographic Information Systems (GIS). The subcommittee recognizes the importance live video would be to those managing and coordinating the response. The spectrum to provide real time video is addressed by the Operational Requirements Subcommittee.

These RF communications paths would also serve to support the current Federal Emergency Management Agency (FEMA) Urban Search and Rescue (USAR) teams and the currently under development USPHS Metropolitan Medical Strike Teams (MMST).

It is further recommended that these RF communications paths be administered by the FCC authorized Public Safety Regional Plan Committee.

APPENDIX D ICS INTRODUCTION/OVERVIEW

D-1 BACKGROUND

1.1 The Incident Command System (ICS) has been developed to provide a common system which public safety agencies can utilize for response to local or wide area emergencies.

1.2 The basic organizational structure of the ICS is based upon reviews of large incident responses in the past; organization needs were subsequently identified. Incident related management organizations in the past were organized informally as needs were identified. Under ICS the organization is pre-identified and is applicable to both small day-to-day situations as well as very large and complex incidents.

D-2 ICS OPERATIONS REQUIREMENTS

2.1 The following are basic system design operating requirements for the Incident Command System:

2.1.1 The System must provide for the following kinds of operation: (1) single jurisdiction/single agency, (2) single jurisdiction with multi-agency involvement, and (3) multi-jurisdiction/multi-agency involvement;

2.1.2 The System's organizational structure must be able to adapt to any emergency or incident to which fire protection agencies would be expected to respond;

2.1.3 The System must be applicable and acceptable to users throughout the county;

2.1.4 The System should be readily adaptable to new technology;

2.1.5 The System must be able to expand in a logical manner from an initial situation into a major incident;

2.1.6 The System must have basic common elements in organization, terminology and procedures which allow for the maximum application and use of already developed qualifications and standards and ensure continuation of a total mobility concept;

2.1.7 Implementation of the System should have the least possible disruption to existing systems;

2.1.8 The System must be effective in fulfilling all of the above requirements and yet be simple enough to ensure low operational maintenance costs.

D-3 COMPONENTS OF THE ICS

The Incident command System has a number of components. These components working together interactively provide the basis for an effective ICS concept of operation:

3.1 Common Terminology

3.1.1 It is essential for any management system, and especially one which will be used in joint operations by many diverse users, that common terminology be established for the following elements:

Organizational Functions: A standard set of major functions and functional units has been predesignated and named for the ICS. Terminology for the organizational elements is standard and consistent.

Resource Elements: Resources refers to the combination of personnel and equipment used in tactical incidental operations; typically resources are grouped in units of 5. Common names have been established for all resources used within ICS. Any resource which varies in capability because of size or manpower (e.g., helicopters) is clearly types as to capability.

Facilities: Common identifiers are used for those facilities in and around the incident area which will be used during the course of the incident. These facilities include such things as the Command Post, Staging Area, etc.

3.2 Modular Organization

3.2.1 The ICS organizational structure develops in a modular fashion based upon the kind and size of an incident. The organization's staff builds from the top down with responsibility and performance placed initially with the Incident Commander. As the need exists four separate Sections can be developed, each with several Units which may be established. The specific organization structure established for any given incident will be based upon the management needs of the incident. If an individual can simultaneously manage all major functional areas, no further organization is required. If one or more of the areas requires independent management, an individual is named to be responsible for that area.

3.2.2 For ease of reference and understanding, personnel assigned to manage at each level of the organization will carry a distinctive organizational title:

Incident Command	Incident Commander
Command Staff	Officer
Section	Section Officer In-Charge
Group	Group Officer
Unit	Unit Leader

3.2.3 In the ICS, the first management assignments by the Initial Attack Incident Commander normally be one or more Section Officers-In-Charge (OICs) to manage the major functional areas. Section OICs will further delegate management authority for their areas only as required. If the Section OIC sees the need, functional Units may be established within the Section. Similarly, each functional Unit Leader will further assign individual tasks within the Unit only as needed.

3.3 Unified Command Structure

3.3.1 The need for a unified command is brought about because:

3.3.3.1 Many incidents have no regard for jurisdictional boundaries. Riots, fires, floods, hurricanes, earthquakes usually cause multi-jurisdictional major incident situations.

3.3.3.2 Individual agency responsibility and authority is normally legally confined to a single jurisdiction.

3.3.2 The concept of unified command simply means that all agencies who have a jurisdictional responsibility at a multi-jurisdictional incident contribute to the process of:

3.3.2.1 Determining overall incident objectives.

3.3.2.2 Selection of strategies.

3.3.2.3 Ensuring that joint planning for tactical activities will be accomplished.

3.3.2.4 Making maximum use of all assigned resources.

3.3.3 The proper selection of participants to work within a unified command structure will depend upon:

3.3.3.1 The location of the incident - which political jurisdictions are involved.

3.3.3.2 The kind of incident - which functional agencies of the involved jurisdictions are required.

3.3.4 A unified command structure could consist of a key responsible official from each jurisdiction in a multi-jurisdictional situation or it could consist of several functional departments within a single political jurisdiction.

3.3.5 Common objectives and strategy on major multi-jurisdictional incidents should be written. The objectives and strategies then guide development of the action plan. Under a unified command structure in the ICS, the implementation of

the action plan will be done under the direction of a single individual, the Operations OIC.

3.3.6 The Operations OIC will normally be from the agency which has the greatest jurisdictional involvement. Designation of the Operations OIC must be agreed upon by all agencies having jurisdictional and functional responsibility at the incident.

3.4 Consolidated Action Plan

3.4.1 Every incident needs some form of an action plan. For small incidents of short duration, the plan need not be written. The following are examples of when written action plans should be used:

3.4.1.1 When resources from multiple agencies are being used.

3.4.1.2 When several jurisdictions are involved.

3.4.1.3 When the incident is of such duration that it will require changes in shifts of personnel and/or equipment.

3.4.2 The Incident Commander will establish objectives and make strategy determinations for the incident based upon the requirements of the jurisdiction. In the case of a unified command, the incident objectives must adequately reflect the policy and needs of all the jurisdictional agencies.

3.4.3 The action plan for the incident cover all tactical and support activities required for the operational period.

3.5 Manageable Span-of-Control

3.5.1 Safety factors as well as sound management planning will both influence and dictate span-of-control considerations. In general, within the ICS, the span-of-control of any individual with emergency management responsibility should range from three to seven units with a span-of-control of five being established as a general rule of thumb. Of course, there will always be exceptions (e.g., an individual Group Officer with responsibility of traffic control Supervision could have substantially more than five personnel).

3.5.2 The kind of an incident, the nature of the task, hazard and safety factors all will influence span-of-control considerations. An important consideration in span-of-control is to anticipate change and prepare for it. This is especially true during rapid build-up of the organization when good management is made difficult because of too many reporting elements.

3.6 Designated Incident Facilities

3.6.1 There are several kinds and types of facilities which can be established in and around the incident area. The determination of kinds of facilities and their locations will be based upon the requirements of the incident and the direction of Incident Command. The following facilities are defined for possible use with the ICS:

Command Post: Designated as the CP, the Command Post will be the location from which all incident operations are directed. There normally should only be one Command Post for the incident. In a unified command structure where several agencies or jurisdictions are involved, the responsible individuals designated by their respective agencies would be co-located at the Command Post. The planning function is also performed at the Command Post, and normally the Communications Center would be established at this location. The Command Post may be co-located with the incident base if communications requirements can be met.

Incident Base: The Incident Base is the location at which primary support activities are performed. The Base will house all equipment and personnel support operations. The Incident Logistics Section, which is responsible for ordering all resources and supplies is also located at the Base. There should only be one Base established for each incident, and normally the Base will not be relocated.

Staging Area: Staging Areas are established for temporary location of available resources. Staging Areas will be established by the Operations OIC to locate resources not immediately assigned. A Staging Area can be anywhere in which personnel and equipment can be temporarily located awaiting assignment. Staging Areas may include temporary sanitation services and fueling. Feeding of personnel would be provided by mobile kitchens or sack lunches. Staging Areas should be highly mobile.

Helibases: Helibases are locations in and around the incident area at which helicopters may be parked, maintained, fueled, and loaded with personnel or equipment. More than one Helibase may be required on very large incidents.

Helispots: Helispots are more temporary and less used locations at which helicopters can land and take off.

3.7 Comprehensive Resource Management

3.7.1 Resources may be managed in three different ways, depending upon the needs of the incident:

Single Resources: Single resources are individual officers, volunteers, mutual aid helicopters, etc., that will be assigned as primary tactical Units. A single resource will be the equipment plus the required individuals to properly utilize it.

Task Forces: A Task Force is any combination of resources which can be temporarily assembled for a specific mission. All resource elements within a Task Force must have common communications and a Leader. Task Forces should be established to meet specific needs and should be demobilized as single resources.

Tactical Units: Tactical Units are a set number of resources of the same kind and type, which have an established minimum number of personnel. Tactical Units will always have a Leader and will have common communications among resource elements. An example of a Tactical Unit in the fire service is a Type 1 Engine Strike Team which would be composed of 5 identical engines Type 1 engines and a leader.

3.7.2 The use of Task Forces is encouraged, wherever possible, to maximize the use of resources, reduce the management control of a large number of single resources, and reduce the communications load.

3.7.3 In order to maintain an up-to-date and accurate picture of resource utilization, it is necessary that:

3.7.3.1 All resources be assigned a current status condition.

3.7.3.2 All changes in resource locations and status conditions be made promptly to the appropriate functional Unit.

3.7.3.3 Status Condition: Three status conditions are established for use with tactical resources at the incident:

Assigned - Performing an active assignment.

Available - Ready for assignment.

Out-of-Service - Not ready for available or assigned status (for example, resources assigned to the Incident Base for rest and rehabilitation.)

D-4 ORGANIZATION AND OPERATIONS

4.1 The ICS organization has five major functional areas. The functional areas are:

4.1.1 Command

4.1.2 Operations

4.1.3 Planning/Intelligence**4.1.4 Logistics****4.1.5 Finance****D-5 THE COMMUNICATIONS UNIT LEADER**

5.1 The Communications Unit Leader, under direction and supervision of the Services Group Officer of Logistics Officer, is responsible for developing plans for the effective use of incident communications equipment and facilities, installing and testing communications equipment, supervision of the Incident Communications Center (not the Incident Dispatchers), and the maintenance and repair of communications equipment.

5.1.1 Obtain briefing from Service Section Officer or Logistics Section Officer.

5.1.2 Determine Unit personnel needs.

5.1.3 Prepare and implement an Incident Radio Communications Plan.

5.1.4 Ensure the Communications Center and equipment are working.

5.1.5 Set up telephone and public address systems, as required.

5.1.6 Establish appropriate communications distribution/maintenance locations.

5.1.7 Ensure radio equipment from outside agencies is accounted for.

5.1.8 Provide technical information as required on:

5.1.8.1 Adequacy of communications systems currently in operation;

5.1.8.2 Geographic limitations on communications systems;

5.1.8.3 Equipment capabilities;

5.1.8.4 Amount and types of equipment available;

5.1.8.5 Anticipated problems with use of communications equipment.

5.1.9 Maintain records on all communications equipment as appropriate.

5.1.10 Recover equipment from relieved or released units.

5.1.11 Maintain Unit Log.

ATTACHMENT 1

Minority Report (Union Pacific Railroad)
(PSWAC/ISC 95-12-059)

UNION PACIFIC RAILROAD COMPANY

INFORMATION
TECHNOLOGIES

1416 DODGE STREET
OMAHA, NEBRASKA 68179



Jim Downes,
Chairperson, ISC
PSWAC
Via Fax

December 12, 1995

Dear Jim,

I was fortunate enough to receive your fax dated December 11, 1995 as I was leaving the building for the airport. I, once again, am on the road attending meeting for the railroad industry in Chicago as well as attending the PSWAC meeting in Washington D.C.

Your fax discusses the definitions of Public Safety/Public Service. I appreciate your "heads-up" call last week to alert me that the definitions that we had submitted were attachments and were not part of the actual text. After reviewing your fax, I was disappointed that the resulting definitions are very ambiguous in relation to the roll the railroad industry has with Public Safety.

You and I have served on many task forces and working groups together over the last several years. I understand that it can be very difficult to obtain consensus within a large group of people. I also realize that I was unable to attend the conference call last week which developed this version of text. That meeting would have given me the opportunity to defend our submission. In addition, a recent development is requiring that I attend a railroad industry meeting to discuss FCC related issues at 10:00 a.m. on December 14, 1995, which conflicts with your subcommittee meeting.

It is my intention to attend the opening portion of your meeting before I leave for my 10:00 a.m. meeting. If this issue is not discussed prior to my departure, I would like to submit the following comments on behalf of the railroad industry:

1. In general, the definitions lack clarity as to which radio users are considered to fall within the public safety definition. If possible, specific examples of public safety users would be very beneficial. Obviously, we would like the railroad industry to be specifically identified as one of the examples.

2. If the subcommittee does not wish to identify any specific user as public safety, we would like to have clarification that the Federal Railroad Administration (FRA) qualifies as a Federal Government entity as identified throughout the definitions. In addition, the railroads, which are governed by the FRA, fall within one or more of the definitions as stated.

3. Finally, if specific users are not identified, we would like to have the statements in item 2 above, agreed to by the subcommittee and submitted into the minutes of the meeting as a point of record.

We appreciate the opportunity to be involved with this landmark event to draw attention to the needs of radio users associated with Public Safety. The Government found it necessary to establish a specific band of frequencies for the railroad industry many years ago based on the need for public safety. It is important that we reiterate that the railroad's use of radio spectrum for public safety has not diminished since then and, in fact, has become more prominent.

If you have any questions or comments, please leave a message at my office (402) 271-4883. I will be checking for messages periodically. I look forward to working with you on upcoming events.

Sincerely,



Edwin F. Kemp
Director, Telecom Engineering
Union Pacific Railroad

cc: Lynn Andrews, UPRR
Roy Creath, UPRR
Tom Keller, V.L.B.McP.&H

ATTACHMENT 2

Minority Report (Dr. Michael C. Trahos)
(PSWAC/ISC 96-02-020)

Before the
FEDERAL COMMUNICATIONS COMMISSION
WIRELESS TELECOMMUNICATIONS BUREAU
PRIVATE WIRELESS DIVISION
Washington, D.C. 20554

In the Matter of)	
)	
Public Safety Wireless Advisory)	WTB-1
Committee (PSWAC);)	
Interoperability Subcommittee:)	PSWAC/ISC 95-12-051/3
)	
Definition of Public Safety/)	
Public Services)	

COMMENTS

Submitted by:

Dr. Michael C. Trahos, D.O., NCE, CET
4600 King Street, Suite 4E
Alexandria, Virginia 22302-1213

February 21, 1996

TABLE OF CONTENTS

	<u>TITLE</u>	<u>PARAGRAPHS</u>
I.	INTRODUCTION	1
II.	COMMENTER QUALIFICATIONS	2-5
III.	COMMENTS	6-14
IV.	CONCLUSION	15-18
V.	FOOTNOTES	Page 7
VI.	ATTACHMENT A - PSWAC/ISC DEFINITIONS	Page 12
VII.	ATTACHMENT B - PROPOSED DEFINITIONS	Page 13
VIII.	ATTACHMENT C - PSWAC CHARTER	Page 14

Before the
FEDERAL COMMUNICATIONS COMMISSION
WIRELESS TELECOMMUNICATIONS BUREAU
PRIVATE WIRELESS DIVISION
Washington, D.C. 20554

In the Matter of)	
)	
Public Safety Wireless Advisory)	WTB-1
Committee (PSWAC);)	
Interoperability Subcommittee:)	PSWAC/ISC 95-12-051/3
)	
Definition of Public Safety/)	
Public Services)	

COMMENTS

Submitted by:

Dr. Michael C. Trahos, D.O., NCE, CET
4600 King Street, Suite 4E
Alexandria, Virginia 22302-1213

February 21, 1996

I.

INTRODUCTION

1. Dr. Michael C. Trahos, D.O., NCE, CET (Commenter), pursuant to the Federal Communications Commission's (Commission) co-sponsored Public Safety Wireless Advisory Committee (PSWAC) (C-ID #2016) Charter (Attachment C), hereby submits these Comments in response to the PSWAC's Interoperability Subcommittee (ISC)/Steering Committee approved "Definition of Public Safety/Public Services" (Attachment A).^{1/}

II. COMMENTER QUALIFICATIONS

2. Commenter is a licensed and actively practicing General Medicine/Family Practice Physician and Surgeon. Commenter holds the academic faculty appointments of Clinical Professor of Medicine from Ross University School of Medicine and Clinical Instructor, Department of Family Medicine, Georgetown University School of Medicine. Commenter holds the current position of Chairman - Legislative Affairs Committee and was President (CY '94) of the Alexandria [Virginia] Medical Society (AMS), was Vice-Councilor (FY '95) - 8th U.S. Congressional District of the Medical Society of Virginia (MSV), is Chairman - Legislative Affairs Committee of the District of Columbia Osteopathic [Medical] Association, was Vice-President (Fys '89-90) of the Virginia [State] Osteopathic Medical Association (VOMA), is VOMA Virginia State Delegate to the [National] American Osteopathic [Medical] Association (AOA) House of Delegates and VOMA Federal Representative to the AOA Council on Federal Health Programs.

3. Commenter was selected/elected and currently serves as the "Medical Profession" Representative on the Technical Committee, Chairman - Legislative/Regulatory Affairs Committee and Special Emergency Radio Service Representative on the RPRC of the National Public Safety Planning Advisory Committee's (NPSPAC) Region-20 [State of Maryland, Washington, DC and Northern Virginia] Public Safety Plan Review Committee (RPRC), for the development and implementation of a Public Safety National/Regional Plan (General Docket No. 90-7) for the use of the 821-824/866-869 MHz bands by the Public Safety Services pursuant to the Report and Order in General Docket No. 87-112.

4. Commenter is a certified First Class Telecommunications Engineer, with expertise endorsements in Administrative/ Regulatory, Antenna Systems, Broadcast AM, Frequency Coordination and Land Mobile Systems, certified by the National Association of Radio and Telecommunications Engineers (NARTE), and possessor of a First Class Certificate of Competency, issued by the Association of Public-Safety Communications Officers (APCO). Commenter is a FELLOW of The Radio Club of America. Commenter has over twenty years experience in the telecommunications field with many of these years spent actively participating in Commission proceedings.

5. Commenter is licensed in the Amateur Radio Service (ARS), the Business Radio Service (BRS), the General Mobile Radio Service (GMRS) and Special Emergency Radio