



TN Statewide Interoperability Executive

TN SIEC

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Federal Communications Commission FCC 06-83
Before the Federal Communications Commission
Washington, D.C. 20554
In the Matter of
Recommendations of the Independent Panel Reviewing the Impact of Hurricane Katrina on
Communications Networks

EB Docket No. 06-119
NOTICE OF PROPOSED RULEMAKING
Adopted: June 16, 2006 Released: June 19, 2006

The Tennessee State Interoperability Executive Committee (SIEC) hereby submits the following comments:

While much of the Katrina report highlights prudent emergency preparedness and management practices, the report also points out many areas that need improvement. The report also states that technology alone is not the answer to interoperability, to which we must agree. Building relationships, first with our counterparts in our own jurisdictions and then in our neighboring jurisdictions can do more to foster interoperability than all the technology we have on our shelves. We also need to realize that the primary goal of interoperability is to establish Command and Control, not to have everyone on the same channel or to having everyone talking to everyone. In order for interoperability to be successful, interoperability has to become incorporated into the daily response system. Otherwise, when the disaster strikes, we will continue to use what we use every day. A disaster is not the time to learn something new or to get the cross-band device out of the box. Lastly, for interoperability to be successful it should not take place on the primary dispatch channel, otherwise we limit our operability.

One way to approach interoperability is to break it down into five primary areas that has to be implemented in order to be effective and successful:

Planning – meeting with various agencies, associations and vendors to determine capability, need and direction. Develop a Plan that can be incorporated into the State / Local Emergency Management Plan.

Policies / Governance – Develop a guide (SOG) for implementation and usage

Training / exercises – make communications training as important as fire arms or other annual training

Technology – which one works best for you and use it. Seek grants.

Relationships – the key to success, get to know each other and learn to work together. Work toward a common goal.

Below are twelve suggestions to improve interoperability / disaster response concerning Section III Number 6, Points 3 & 4.

1. Cross band devices such as the JPS, ICRI, etc. are a tool, not the answer to interoperability. These devices take training to implement successfully and can cause more harm than good.
2. Mandate a common CTCSS tone of 156.7 Hz for Interoperability VHF and UHF channels.
3. Mandate the implementation on the VHF, UHF, 700, and 800 MHz Interoperability channels for licensee using those bands. 700 & 800 MHz may be addressed in Regional Plans.
4. Mandate a common nomenclature for the designated interoperability channels.
5. Give State and Local government access to the Federal Interoperability channels in VHF & UHF bands.
6. Move existing licensees on the VHF and UHF interoperability channels so that they are available for interoperability usage and not have to compete with grandfathered dispatch operations or secondary telemetry, etc. Also eliminate licensing of the interoperability channels for any purpose other than interoperability.
7. Mandate that the wideband licensees adjacent to the VHF / UHF interoperability channels move to narrowband emission to minimize interference to the interoperability channels.
8. Designate 155.370 as an inter-agency channel nationwide and implement a CTCSS tone to minimize interference.
9. Require each state to have a functional SIEC.
10. FCC protection of state designated mutual aid channels.
11. Easier access for Public Safety to unlicensed spectrum in the 150 MHz & 454 MHz spectrum or set aside some of this spectrum for additional interoperability channels.
12. Broadcasters work with Local and State government to establish portable / trailer mounted FM broadcast station focused in the FM spectrum in 87.7 to 91.9 for transmission of public information. Also have a cache of FM portable receivers that can be disseminated to the public. Also encourage the Public to purchase FM portable radios for emergency information.

Thank you for the opportunity to comment.

Respectfully submitted,



SIEC

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