

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
	)	
Recommendations of the Independent Panel	)	EB Docket No. 06-119
Reviewing the Impact of Hurricane Katrina	)	
on Communications Networks	)	

**COMMENTS OF USA MOBILITY, INC.**

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USA Mobility, Inc. (“USA Mobility”) respectfully submits these comments in response to the Commission’s Notice of Proposed Rulemaking in the above-captioned docket regarding the Recommendations of the Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks (“Independent Panel”).<sup>1</sup>

**INTRODUCTION AND SUMMARY**

USA Mobility applauds the Commission’s efforts to improve emergency communications. Hurricane Katrina amplified the lessons learned during 9/11 and previous crises: Information must be transmitted as quickly and seamlessly as possible when disaster strikes, both among emergency responders and to the general public. The Independent Panel has made significant contributions toward the achievement of this goal by detailing the severe effects of Hurricane Katrina on communications systems and by recommending ways to improve communications during future emergencies.

The Independent Panel found that paging networks and devices performed exceptionally well in withstanding the fury unleashed by Hurricane Katrina. Indeed, paging services in some

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<sup>1</sup> *Recommendations of the Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks*, Notice of Proposed Rulemaking, EB Docket No. 06-119, FCC 06-83 (rel. June 19, 2006) (“*NPRM*”).

instances offered the only available means of communication. As the Independent Panel recognized, the extraordinary reliability and inherent redundancy that result from paging's network architecture and other key attributes make pagers an indispensable tool for first responders, medical personnel, and government agencies.<sup>2</sup> In fact, these attributes enable paging services to remain operational in an extremely broad array of emergencies.<sup>3</sup> As a result, as the Independent Panel took pains to emphasize, more widespread use of paging devices by first responders and medical personnel during emergencies would significantly enhance public safety.<sup>4</sup>

USA Mobility urges the Commission to implement the recommendations of the Independent Panel as expeditiously as possible. In particular, the Commission should take concrete steps to increase awareness within the public safety community of the benefits of paging. For example, the Commission should heed the Independent Panel's advice to promote paging at public safety conferences and to post information on paging on the Commission's website. The Commission should also issue guidelines that can be used by the communications industry in developing emergency readiness checklists.

Furthermore, the Commission should follow the Independent Panel's recommendations regarding recovery coordination. These recommendations include ensuring broader access for infrastructure and service providers to disaster-affected areas, granting emergency responder status to service providers and contractors, and broadening the membership base at the National

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<sup>2</sup> Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks, *Report and Recommendations to the Federal Communications Commission*, at 10, 24 (June 12, 2006) ("*Report*").

<sup>3</sup> Public Notice, *Request for Comment on Applicability of Recommendations to All Types of Disasters*, EB Docket No. 06-119, DA 06-1524 (July 26, 2006) ("*July 26 Public Notice*").

<sup>4</sup> *See Report* at 32, 38.

Coordination Center for Telecommunications (“NCC”). Finally, the Commission should move forward with its proposed expansion of the emergency alert system (“EAS”), taking advantage of the unique benefits of paging technology for alerting purposes.

## **BACKGROUND**

USA Mobility is the leading provider of traditional one-way and advanced two-way paging services in the United States. USA Mobility was formed in late 2004 by the merger of Arch Wireless, Inc. and Metrocall Holdings, Inc., then the nation’s two largest independent paging and wireless messaging companies. As of March 31, 2006, USA Mobility provided service to over 4.6 million messaging devices, out of a total of more than 8 million units industry-wide.

While the mass market for paging services has declined in recent years as consumers have increasingly relied on mobile phones, paging services continue to play a critical role for first responders, including police officers, fire fighters, and rescue workers. In addition, hospitals and health clinics, as well as government agencies, rely heavily on paging services. USA Mobility also serves more than 80 percent of Fortune 1000 companies. USA Mobility’s paging networks, which include approximately 15,000 transmitters, reach more than 90 percent of the U.S. population with one-way service and over 80 percent with two-way service.

## DISCUSSION

### I. THE INDEPENDENT PANEL APPROPRIATELY RECOGNIZED THE DISTINCTIVE BENEFITS OF PAGING SERVICES FOR EMERGENCY COMMUNICATIONS.

#### A. Paging Technology Is Extraordinarily Reliable, Redundant, and Affordable.

As noted in the Independent Panel *Report*, paging services are ideally suited to emergency communications as a result of their superlative reliability, redundancy, and affordability.<sup>5</sup>

Several network attributes combine to make paging one of the most reliable communications technologies on the market today. Paging's network architecture combines digital satellite transmission with an extensive system of terrestrial transmitters and paging switches. Because its narrowband PCS transmitters are controlled by satellites, the paging transmission network is far less dependent on the public switched telephone network than many other wireless systems—and thus far less vulnerable to outages during natural disasters and other emergencies. Satellite transmission also allows messages to be directed to multiple base-station paging transmitters within a geographic footprint in a “simulcast” fashion. Paging networks also enjoy inherent redundancy based on this simulcast technology. Paging messages are simulcast from multiple towers to each paging device, and therefore damage to a single tower or even several towers does not necessarily interrupt the delivery of messages, as the device might be able to receive signals from other towers in the area. Mobile voice networks typically lack this capability.

Another distinctive feature of paging networks is that paging transmitter antennas are located on towers high off the ground (over 300 feet) and on the tops of buildings, and emit

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<sup>5</sup> See *Report* at 10; see also Comments of USA Mobility, *Review of the Emergency Alert System*, EB Docket No. 04-296 at 6-8 (Jan. 24, 2006).

extremely powerful signals of up to 3,500 watts ERP. In contrast, most mobile phone transmitter antenna arrays typically are located 100 feet above the ground and emit significantly less powerful transmitter signals of 90 watts ERP. Because paging signals are simulcast by high-powered transmitters, they can travel farther and penetrate buildings better than signals used by other wireless technologies. Additionally, many mobile phone outages result from damage to their large antenna arrays, in contrast to the resilience of the smaller antennas utilized by paging systems.

Paging devices are also very reliable. Unlike cell phones and PDAs, pagers typically run on a single AA or AAA battery and have a long battery life relative to other wireless devices. These battery-powered pagers are not affected by a loss of electrical power because there is no need to recharge them.

Moreover, paging devices and service plans are affordable, particularly relative to other wireless services. A typical paging service plan includes the use of the paging device and still costs less than \$10 per month. This low cost continues to make pagers an attractive option for federal, state, and local government agencies, hospitals, and businesses that need basic messaging capabilities, either for primary use or to back up their broadband services. The cost savings also benefit low-income consumers who cannot afford more expensive wireless communications services.

**B. These Attributes Resulted in Exemplary Performance During Hurricane Katrina.**

Hurricane Katrina was a devastating event for all communications providers serving the Gulf Region. But Katrina also exposed the fundamental differences between paging technology and other wireless technologies—differences that caused paging networks to remain operational longer and enabled them to be restored more quickly than voice networks. According to the

Independent Panel, “Two-way paging operations remained generally operational during the storm and did provide communications capabilities for some police, fire [and] emergency medical personnel.”<sup>6</sup> Although nearly half of USA Mobility’s transmitters in the region were knocked out of service by Katrina’s landfall, USA Mobility was able to maintain partial network coverage for the duration of the storm because of its simulcasting capabilities and its independence from the PSTN. Full network coverage was restored within two days, while other communications systems were disabled for much longer.

The Independent Panel determined that paging performed better during the storm than many other communications technologies. As the Panel explained:

- “Paging systems seemed more reliable in some instances than voice/cellular systems because paging systems utilize satellite networks, rather than terrestrial systems, for backbone infrastructure.”
- “Paging technology is also inherently redundant, which means that messages may still be relayed if a single transmitter or group of transmitters in a network fails.”
- “Paging signals penetrate buildings very well, thus providing an added level of reliability.”
- “Additionally, pagers benefited from having a long battery life and thus remained operating longer during the power outages. Other positive observations concerning paging systems included that they were effective at text messaging and were equipped to provide broadcast messaging.”
- “[G]roup pages can be sent out during times of emergencies to thousands of pager units all at the same time.”<sup>7</sup>

These benefits not only explain why paging services stood up so well during Hurricane Katrina, but also why pagers are ideal communications devices for use in other types of disasters. USA Mobility’s broad network coverage enables it to respond to crises in urban and rural areas alike, and its network attributes—including in particular its simulcasting capabilities—position it

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<sup>6</sup> *Report* at 24.

<sup>7</sup> *Id.* at 10 (each bullet point) (citations omitted).

well for “natural disasters (*e.g.*, earthquakes, tornados, hurricanes, forest fires) as well as other types of incidents (*e.g.*, terrorist attacks, flu pandemic, industrial accidents, *etc.*).”<sup>8</sup> The Independent Panel’s recommendations likewise transcend hurricane-specific concerns; they will facilitate improvements in emergency communications for any conceivable disaster. USA Mobility accordingly urges the Commission to adopt the recommendations of the Independent Panel, as described more fully below.

**II. THE COMMISSION SHOULD IMPLEMENT THE INDEPENDENT PANEL’S RECOMMENDATIONS REGARDING DISASTER PREPARATION AND FIRST RESPONDER COMMUNICATIONS BY PROMOTING WIDESPREAD USE OF PAGING DEVICES.**

**A. The Commission Should Actively Promote Paging Services and Other Resilient Technologies to Emergency Responders.**

As the Independent Panel repeatedly recognized, paging services can play an integral part in bolstering the reliability and redundancy of emergency communications capabilities. The transmission of information on a timely and reliable basis is a critical component of emergency response, and indeed can save lives in many cases. The Commission therefore should fulfill its bedrock responsibility to “promot[e] safety of life and property through the use of wire and radio communication”<sup>9</sup> by promoting the widespread use of paging—in particular by the public safety community. As the national hub of communications-related information and a leader in the multiagency effort to update the Nation’s public safety communications capabilities, the Commission is uniquely positioned to achieve these goals.

Many of the communications failures identified by the Independent Panel can be overcome through reliance on paging services, either on a primary basis or as a backup to voice services. The *Report* detailed numerous breakdowns in the PSTN as a result of “significant

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<sup>8</sup> *July 26 Public Notice* at 1.

<sup>9</sup> 47 U.S.C. § 151.

damage both to the switching centers that route calls and to the lines used to connect buildings and customers to the network.”<sup>10</sup> A U.S. Senate Report confirmed that “over 20 million calls attempted on Tuesday, August 30, the day after landfall, could not be completed.”<sup>11</sup>

Compounding the difficulties, “there were numerous instances of fiber lines cut accidentally by parties seeking to restore power, phone, and cable, remote trees and other debris, and engage in similar restoration activities.”<sup>12</sup> Likewise, cellular and broadband PCS networks “received considerable damage with more than 1000 base station sites impacted,” in many cases because “[t]he transport connectivity is generally provided by the local exchange carrier.”<sup>13</sup> As the *Senate Report* observed, “Katrina’s devastating impact on communications infrastructure around New Orleans forced first responders to rely on five or fewer mutual-aid channels—recognized by multiple agencies as channels to use when the coordinating electronics of the radio system fails—for voice radio communications. But around 4,000 people were competing to use that constricted capacity,” resulting in significant communications failures.<sup>14</sup> Moreover, broadcasting—the traditional focal point for public alerts—was devastated by Hurricane Katrina: “[I]n New Orleans and the surrounding area, only 4 of the 41 broadcast radio stations remained

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<sup>10</sup> *Report* at 8-9.

<sup>11</sup> S. Comm. on Homeland Security and Gov’t Affairs, 109th Cong., *Hurricane Katrina: A Nation Still Unprepared*, at 18-3 (May 2006) (“*Senate Report*”); *see also id.* at 18-5 (“State and local emergency operations centers were left in a ‘communications void,’ often unable to communicate with first responders or to relay requests for assistance up the chain of command. Part of the problem was serious call congestion on surviving land lines.”).

<sup>12</sup> *Report* at 14.

<sup>13</sup> *Id.* at 9.

<sup>14</sup> *Senate Report* at 18-5.

on the air in the wake of the hurricane.”<sup>15</sup> In any event, most viewers and listeners could not receive broadcasts because of power outages.<sup>16</sup>

In stark contrast, paging services proved far more resilient than other services, in large part because of their independence from the PSTN. In addition, while consumers and first responders that lost power could not charge their cell phones and blackberries or receive broadcast transmissions, they could continue to receive messages via pagers powered by AA and AAA batteries for weeks or longer.

Based on the comparative strengths of paging services and other technologies that do not rely on the PSTN for backhaul purposes, the Independent Panel called on public safety agencies to employ such services as “back-up communications options.”<sup>17</sup> In particular, the Independent Panel observed that, while paging services remained operational during the storm and proved valuable to emergency responders, they “could have been more widely utilized.”<sup>18</sup> The Independent Panel therefore concluded that “[t]he FCC should take steps to educate the public safety community about the availability and capabilities of non-traditional technologies that might provide effective back-up solutions for existing public safety communications systems . . . [such as] pagers.”<sup>19</sup> Other alternative technologies—most notably satellite phones—share paging’s independence from the PSTN, but none can deliver the requisite reliability at such an

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<sup>15</sup> *Report* at 12.

<sup>16</sup> *See id.*

<sup>17</sup> *Id.* at 24. *See also* Peter Kapsales, *Wireless Messaging for Homeland Security: Using Narrowband PCS for Improved Communication During Emergencies*, 1 (March 2004), available at [www.homelanddefense.org/journal/Articles/Kapsales.html](http://www.homelanddefense.org/journal/Articles/Kapsales.html) (noting that, based on its exemplary performance during 9/11, two-way paging services “should be considered a primary or backup system to improve real-time communication among emergency personnel during critical periods when voice communication is not practical or fails.”).

<sup>18</sup> *Report* at 24.

<sup>19</sup> *Id.* at 32.

affordable price. While USA Mobility's text-messaging services typically cost less than \$10 per month, including the use of the paging device, mobile satellite phone services typically require investments of more than \$1,000 per handset and airtime charges cost more than \$1.00 per minute.<sup>20</sup> Nor can these other technologies match paging's extensive base of existing subscribers.

USA Mobility strongly endorses the Independent Panel's recommendation that the Commission take concrete steps to promote the use of pagers among emergency workers. *First*, the Commission should work with industry representatives to organize demonstrations and exhibits at public safety conferences to promote the use of pagers and other resilient technologies.<sup>21</sup> This collaborative effort is consistent with the public/private partnership approach advocated by commenters in the ongoing EAS proceeding and the working group approach embodied in pending legislation regarding an expanded alert system.<sup>22</sup>

*Second*, the Commission should develop and disseminate written information sheets recommending pagers as primary or backup devices for emergency responders, and it should post this information on its website. As the Independent Panel advised, the Commission should "[u]rge public safety licensees to familiarize themselves with alternative communications technologies to provide communications when normal public safety networks are down . . .

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<sup>20</sup> See, e.g., [www.satellitediscountstore.com/iridium.htm](http://www.satellitediscountstore.com/iridium.htm) (visited Aug. 7, 2006); [www.satphonestore.com](http://www.satphonestore.com) (visited Aug. 7, 2006).

<sup>21</sup> See *Report* at 32.

<sup>22</sup> See, e.g., Comments of CTIA, Further Notice of Proposed Rulemaking on Expanded Emergency Alert System, WC Docket No. 04-296 at 7-8 (Jan. 24, 2006); Warning, Alert, and Response Network Act, H.R. 5556, 109th Cong. § 5 (2d Sess. 2006).

includ[ing] . . . two-way paging devices.”<sup>23</sup> Dissemination of information through fact sheets and the Commission’s website will help implement this recommendation.

*Third*, the Commission should seek to expand the already-extensive use of paging devices by emergency medical personnel. More than 30 percent of USA Mobility’s customer base consists of doctors, nurses, and other health care personnel. During Katrina, pagers in many cases offered the only way for medical personnel to communicate. One customer at Women’s Hospital in New Orleans reported: “Pagers were used by Medical Staff for communicating with the doctors and nurses in transporting the Mom’s and Babies from one facility to another. Text messaging was the only way to get critical messages out to the doctors and nurses since phone lines were all down or all circuits busy.”<sup>24</sup> Similarly, an official with Tulane Lakeside Hospital stated:

It wouldn’t be economically feasible for a facility the size of Tulane to provide cellular service to all their essential employees, so we depend on USA Mobility to provide us with a dependable means to stay in contact with our employees that is cost effective. Your dependability became more evident when other cellular and paging providers lost service after Hurricane Katrina and your service is still going.<sup>25</sup>

As these testimonials demonstrate, paging’s reliable messaging capabilities can save lives and warrant strong governmental support. To this end, the Commission should heed the Independent Panel’s recommendation to “[s]upport DHS efforts to make emergency medical providers

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<sup>23</sup> *Report* at 38.

<sup>24</sup> Written Statement of Vincent D. Kelly, President and Chief Executive Officer, USA Mobility, Before the FCC’s Independent Panel Reviewing the Impact of Hurricane Katrina at 3 (Mar. 6, 2006) (“*USA Mobility Panel Testimony*”).

<sup>25</sup> *Id.* at 4.

eligible to for funding for emergency communications equipment under the State Homeland Security Grant Program.”<sup>26</sup>

*Finally*, USA Mobility agrees with the Independent Panel that public safety personnel should receive adequate training in the use of “alternative communications technologies, such as paging, satellite, [and] license-exempt WISP systems.”<sup>27</sup> Because paging devices are very simple to use, however, the Commission’s promotion of paging technology will not require lengthy training programs or other resource-intensive measures. USA Mobility is not aware of any public safety officials experiencing communications problems based on their lack of familiarity with paging devices, as appeared to occur with satellite phones and other technologies.<sup>28</sup> Nevertheless, USA Mobility is fully committed to working with the Commission and its customers to ensure that paging services are seamlessly available when other public safety communications networks are inoperable.

**B. The Commission Also Should Publicize Readiness Guidelines for Service Providers.**

In addition to taking practical steps to increase awareness and use of reliable, resilient communications technologies, the Commission should help communications providers prepare for future emergencies. Under emergency conditions, performance without preparation is unlikely, if not impossible. One reason for the success of USA Mobility’s response to Hurricane Katrina was the significant preparation effort undertaken by the company before the storm made landfall. USA Mobility tested its systems extensively; staged portable generators in anticipation of likely power outages; deployed critical personnel in and around the projected strike area;

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<sup>26</sup> *See id.* at 40.

<sup>27</sup> *Report* at 8.

<sup>28</sup> *See id.*

activated a backup, PIN-based message-retrieval system; and supplied thousands of pagers to federal, state, and local emergency response organizations.<sup>29</sup> These strategic preparations enabled USA Mobility to harness the strengths of paging technology to provide superior communications service to emergency responders, medical personnel, and government officials during and after the storm.

The Commission should promote comparable readiness measures for all service providers, as the Independent Panel recommended.<sup>30</sup> This effort should be undertaken in conjunction with the Network Reliability and Interoperability Council (“NRIC”) and Media Security and Reliability Council (“MSRC”). For example, the Commission should establish voluntary guidelines to help providers create emergency readiness checklists.<sup>31</sup> The Commission should work with NRIC and MSRC to develop sector-specific guidance regarding business continuity plans and training. In particular, as discussed above, “public safety agencies should be reminded/encouraged to train and use [alternative technologies such as two-way pagers] prior to emergencies.”<sup>32</sup>

### **III. THE COMMISSION SHOULD IMPLEMENT THE INDEPENDENT PANEL’S RECOMMENDATIONS REGARDING RECOVERY COORDINATION.**

USA Mobility also urges the Commission to adopt the recommendations of the Independent Panel regarding recovery coordination. There are several steps the Commission can take to ensure that future disaster recovery efforts are accomplished more effectively and efficiently.

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<sup>29</sup> See USA Mobility Panel Testimony at 4-5.

<sup>30</sup> See *Report* at 31.

<sup>31</sup> See *id.*

<sup>32</sup> *Id.* at 38.

As an initial matter, the Commission should work with other federal agencies to develop national credentialing requirements and process guidelines for giving all infrastructure and service providers access to affected areas following a disaster. As noted by the Independent Panel, communications providers experienced significant difficulties in the wake of Hurricane Katrina in obtaining and maintaining access to damaged infrastructure.<sup>33</sup> Such impediments were particularly problematic “for smaller or non-traditional communications companies, who tended to have lower levels of name recognition with law enforcement personnel guarding the perimeter.”<sup>34</sup> There is no question that such access issues can “interrupt and hamper the recovery process.”<sup>35</sup>

In USA Mobility’s experience, such access issues have impeded recovery efforts not only following Katrina but after Hurricanes Wilma and Rita in 2005, Hurricane Charley in 2004, and 9/11. USA Mobility personnel have been denied access to transmitter sites by law enforcement as well as by other service providers, and even where access has been allowed, shortages in fuel and other basic necessities were common. These problems have led to significant delays in restoring full service, notwithstanding USA Mobility’s inherent advantages based on its simulcasting technology.

Credentialing service providers, their employees, and their contractors will ensure that critical repair personnel have access to disaster-ridden areas while also meeting legitimate concerns about security. Once federal credentialing requirements and process guidelines are in

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<sup>33</sup> *Report* at 15-17.

<sup>34</sup> *Id.* at 16. *See also Senate Report* at 18-4 (“Repair workers also had difficulty gaining access to their equipment and facilities in the field because police and National Guard in some cases refused to let them enter the disaster area.”).

<sup>35</sup> *Report* at 17.

place, states should develop credentialing programs and begin credentialing communications providers subject to receipt of a basic training course in emergency management.<sup>36</sup>

Similarly, the Commission should work with the National Security Telecommunications Advisory Committee (“NSTAC”) and Congress to provide emergency responder status under the Stafford Act to telecommunications infrastructure providers and their contract workers.<sup>37</sup> Such status will help provide much-needed security for repair personnel, many of whom were subjected to grave risks during the looting and rioting that occurred in some areas in the wake of Hurricane Katrina.<sup>38</sup>

Furthermore, a broader cross-section of service providers should participate in developing best practices and in coordinating post-disaster recovery efforts. In particular, given paging’s suitability for emergency communications, a representative of the paging industry should be included in the NRIC process as well as in the NCC.<sup>39</sup> USA Mobility is prepared to participate in NRIC and the NCC.

Finally, the Commission should work to improve coordination at the state and regional levels. As illustrated by Hurricane Katrina, 9/11, and other disasters, even emergencies of national importance are fundamentally local in nature. USA Mobility therefore endorses the Independent Panel’s recommendations to enhance state and local recovery efforts, such as (1) scheduling regular emergency preparedness meetings between state and local officials and

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<sup>36</sup> *See id.* at 34.

<sup>37</sup> *See id.* at 35.

<sup>38</sup> *See Senate Report* at 18-4 (Despite efforts by NCS to obtain adequate security for all telecommunications providers, “security arrangements with the Louisiana National Guard fell through. Ultimately, telecommunications providers hired private security to protect their workers and supplies.”).

<sup>39</sup> *See Report* at 36 (“The FCC should work with the NCS to broaden the membership of the [NCC] to include adequate representation of all types of communications systems . . .”).

industry representatives, (2) establishing state credentialing programs for communications infrastructure providers and their contractors, (3) developing state Emergency Preparedness Plans to facilitate credentialing, security, and coordination, (4) sharing information and resources, and (5) maintaining priority lists for utilities' commercial power restoration of affected communications providers.<sup>40</sup> To ensure that communications providers have secure access to important state and FCC contact information, the Commission should implement a password-protected website listing key state emergency management contacts and post-disaster coordination areas, as well as a website listing key FCC contacts.<sup>41</sup>

#### **IV. THE COMMISSION SHOULD ACCELERATE ITS DEVELOPMENT OF AN EXPANDED EMERGENCY ALERT SYSTEM, AS THE PANEL RECOMMENDS.**

USA Mobility applauds the Commission for its progress toward the development of an expanded EAS. As the Independent Panel recommends, the Commission should expeditiously advance its plan to develop an expanded EAS that includes wireless technologies and the Internet.<sup>42</sup> In our increasingly mobile society, the general public must receive emergency alerts wirelessly. Paging is optimally suited for that task because of its reliable network infrastructure and devices. As noted in USA Mobility's comments in the EAS proceeding, paging networks transmit messages in a point-to-multipoint fashion, which can allow millions of users to receive critical information simultaneously, without the risk of network inundation that plagues other wireless technologies.<sup>43</sup> The same attributes that enabled paging to perform so well for emergency responders during Hurricane Katrina—and thereby win the praise of the Independent

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<sup>40</sup> *See id.* at 35-36.

<sup>41</sup> *See id.* at 37.

<sup>42</sup> *Id.* at 40.

<sup>43</sup> *See* Comments of USA Mobility, EB Docket No. 04-296, at 7 (Jan. 24, 2006) (“*USA Mobility EAS Comments*”).

Panel—also make paging an ideal platform for the dissemination of emergency information to the public. In fact, paging networks not only enable carriers like USA Mobility to transmit alerts to their subscribers, but can support the simultaneous transmission of millions of additional messages if mobile voice carriers integrate paging technology into their handsets.

As USA Mobility has argued in the EAS proceeding, mandatory participation of wireless carriers will best serve the public interest, provided there is adequate government funding, liability protection for participating service providers, and sufficient time for carriers to deploy new network facilities and to roll out new handsets.<sup>44</sup> USA Mobility also believes that the Commission should create a working group composed of representatives from each industry sector, as well as key government officials.<sup>45</sup> A collaborative public/private effort is the best way to achieve the Commission's goal of a robust, reliable, and redundant EAS. In light of paging's unique contributions to emergency communications, the paging industry should be assured a voice in the working group.

## CONCLUSION

For the foregoing reasons, the Commission should adopt the recommendations of the Independent Panel. Because of paging's proven performance during Hurricane Katrina and the distinctive attributes of paging networks and devices, the Commission should promote widespread use of pagers by first responders, medical personnel, and government officials. The Commission also should implement the Independent Panel's recommendations regarding recovery coordination, making sure that reliable technologies like paging are adequately represented in the process. Finally, the Commission should harness the benefits of paging in the

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<sup>44</sup> See Reply Comments of USA Mobility, EB Docket No. 04-296, at 1 (Feb. 23, 2006).

<sup>45</sup> See USA Mobility EAS Comments at 12.

expanded EAS and facilitate efforts to integrate paging technology into a broader array of wireless devices.

Respectfully submitted,

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