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Lisa Fowlkes**From:** Williams, Richard C [rwilliam@co.pinellas.fl.us]**Sent:** Friday, August 18, 2006 4:33 PM**To:** Lisa Fowlkes; Janice Wise**Cc:** Montanari, Pamela J**Subject:** EB Docket No. 06-119

Ms. Fowlkes and Ms. Wise,

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Federal Communications Commission
Office of the Secretary

Thank you for the opportunity to comment on the proposed recommendations "In the Matter of Recommendations of the Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks; Notice of Proposed Rulemaking".

Pinellas County is located on the West coast of Florida on the Gulf of Mexico and Tampa Bay. The county population including seasonal residents and tourists approached 1.4 million. Pinellas County is the most dense county in Florida with 3,500 citizens per square mile. We operate intergovernmental countywide public safety voice and data radio systems with over 9,000 users on the network. We also are active participants in the regional communications coordination group under DHS and UASI.

Please find our comments on EB Docket No. 06-119. from Pinellas County Florida below.

Dick Williams, Director**Emergency Communications Dept.****400 S. Ft. Harrison Ave., Suite 140****Clearwater, FL 33756****(727) 464-3860****Dick.Williams@pinellascounty.org**

- 1. Readiness Checklists** - Strongly support readiness checklists, to check systems and equipment prior to an event. This would also identify what is not readily available and could be pre-positioned for response to the affected area. Checklists should also be developed for personnel responding to the disaster to ensure that they are fully prepared for the response.
- 2. FCC Authority and Coordination** - FCC should be prepared to respond to the affected area and coordinate communications directly with those jurisdictions affected by the disaster. If STA's are granted without prior coordination it could cause interference issues for communications personnel responding to repair the damaged infrastructure. Personnel responding to the affected area need to coordinate frequencies prior to responding to the incident. In Florida, after Hurricane Charley, multiple agencies brought in mobile repeaters that directly interfered with operational systems. When Pinellas County responded to Mississippi after Katrina, all frequency coordination was completed prior to the deployment. Another alternative would be for the FCC to reserve frequencies in 700 & 800 MHz for mobile response systems, where a network of systems would be used to deploy to adjacent regions.
- 3. Equipment caches** – Support having equipment caches for some equipment, however, it is not feasible or economical to have enough equipment for restoration of large scale systems. Agencies should pre-coordinate with the vendor to plan what equipment may be needed to restore their systems to operation after a catastrophe. Agencies should maintain adequate fuel for generator, radios and batteries until additional equipment can be delivered. In Florida communications are coordinated on a statewide basis prior to a hurricane, and regular conference calls are held between key personnel, so immediately after a storm, assets can be moved into the affected area.
- 4. Equipment Staging** – Support having a staging area for equipment. This area would need to be out of the path of the storm, and should also include equipment from public safety vendors, and commercial services. Equipment and locations should be pre-coordinated, where immediate delivery could take place.
- 5. Credentialing of Communications support personnel** – Strongly support the credentialing of all communications support personnel, as these are the people who will be restoring the communications capabilities

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to public safety personnel. In the past there have been several delays for these personnel gaining access to the affected area, and they should be given the same priority as first responders. This should include personnel employed by local and regional governments, as well as vendors who are contractors to those governments.

6. Public Safety Communications Capabilities – Support the use of multiple technologies and training for personnel, so there are multiple redundancies and interoperability for public safety personnel. Funding consideration should be given to agencies that are located in coastal regions that are vulnerable to hurricanes and flooding, since it is not economically feasible to fund infrastructure for multiple systems and technologies. Tactical Interoperable Communications plans have been developed and tested and show the communications resources available throughout the region. The TIC plans have valuable information and should be used during all events to identify what resources could be deployed.

7. Secondary Backup PSAPs Location – We do not support the recommended siting of secondary backup PSAPs over 200 miles away. Connectivity to the Tandem switches as well as the ability to connect to the radio communications systems in the jurisdiction are impractical. The establishment of sufficiently resilient backup PSAPs can be done within the immediate region. The cost of establishing and maintaining such backups are not affordable by most jurisdictions and would not be supported based on the slim chance that a major hurricane might hit the county.

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