



UTAH STATE FIRE CHIEFS ASSOCIATION



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November 22, 2006

The Honorable Kevin J. Martin
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Docket No. RM-11348 - Reallocation of 30 MHz Spectrum (747-762/777-792 MHz) From Commercial Use

Dear Chairman Martin:

The Utah State Fire Chiefs Association (USFCA) mission includes ensuring and maintaining greater protection of life and property from fire, natural or man-made disaster as well as advocacy regarding legislation affecting the fire service. On behalf of our members, we are concerned with the adequacy of the communications systems that support the fire service in their response to major incidents. Specifically, we are concerned that there are inadequate spectrum resources available to support critical public safety interoperable communications requirements.

As we learned when hosting the Olympics, large scale events require complex communications needs. The same applies when we are preparing to protect the lives of our citizens and first responders during large scale natural disasters, a terrorism attack, or daily emergencies requiring a coordinated response by multiple disciplines. It is critical that the men and women of public safety have uninterrupted access to the most effective and robust communications resources available; such as a nationwide, interoperable, wireless communications system designed to rigorous public safety requirements would provide. Anything less would compromise our operations and our safety, which is what happened when communications failed during the response to the attacks on the World Trade Center and hurricanes Katrina and Rita. In our opinion, such failures are avoidable in light of the advanced technology that currently exists and is deployed commercially. We in the fire service have struggled for years knowing that we cannot readily talk between radio systems and critical time is lost in the attempt.

We feel the time is now to ensure that we do not endure another disaster without a fully interoperable nationwide system supporting voice and data needs.

Utah has been recognized as a leader in this arena as we were one of the first states nationally to successfully submit our plan for 700 MHz. usage. Much has been learned since we rolled out our advanced 800 MHz. system prior to the Winter Olympics. I would hope that by addressing this most critical issue of band allocation that the FCC avoids problems that plague our system with private interference today.

The USFCA endorses the principles proposed within petition RM-11348 for deployment of an advanced, nationwide, wireless broadband network dedicated to public safety communications needs, which will be financed and maintained through a public/private partnership. The Utah State Fire Chiefs Association supports allocation of an additional 30 MHz of spectrum at 700 MHz to public safety and the creation of a Public Safety Broadband Trust (PSBT).

The USFCA recognizes that Congressional action will be required as well to ensure that this spectrum is not auctioned for commercial use, but instead assigned to the Public Safety Broadband Trust to be used for primary, interoperable public safety operations. The USFCA also urges our Congressional Delegation to endorse, sponsor and support the innovative approach to meeting critical public safety communications needs in the current proposal and to act promptly in support thereof.

We urge the FCC to assist public safety by enabling us to obtain the proper tools we need to protect the lives of our citizens and fellow responders. Our job is complex and unfortunately we experience an ever-increasing call load in all of our jurisdictions. We ask that the FCC do what is necessary to expand our capabilities.

Sincerely,

Steven F. Foote
President
Utah State Fire Chief's Association

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