

Our agency is the sole advanced life support ambulance service serving 2 rural counties in NE Minnesota. We rely heavily on the use of VHF paging provided by our sheriff 911 PSAP to deploy our resources. The frequencies, in the 150-160 MHz range, are crucial to our EMS response and critical life-saving operations.

Since the overall concern in the NPRM process in this rule change relates to interference with public safety communications it seems at a minimum it would be vital to waiver law enforcement, fire service, and EMS dispatching as well as other associated first responder agencies such as search and rescue organizations.

As history has related, the Sept 11th terrorist attacks and the impact of the Katrina and Gulf Coast natural disaster were exposed to significant delays in response caused by technical communication failures. The types of failures involved in those two scenarios could have been further impacted by technical FCC rules that create more limitations for contact between command centers and needed response agencies.

Day to day operations across most of the US require simple single channel "page to respond" initiation of response. Any rule that intends to limit or eliminate the practice will cripple dispatching of needed first responder agencies.

Without VHF paging, telephone dispatch or digital paging would be the only options in the present communication systems available to most public safety agencies in the US other than those in cities of the first class. These two communication platforms are the precise types that have limits during mass casualty responses and are also those that fail during other, more common situations such as weather events.

The public needs for timely and immediate care must be considered when applying regulatory changes as listed in this proposal.

Thank you for considering these comments.

Sincerely,

Timothy J. George NREMT-P

Director of Operations, Meds-1 EMS