



Oregon

Theodore R. Kulongoski, Governor

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June 20, 2008

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

RE: Comment on WT Docket No. 06-150 and PS Docket No. 06-229

Chair Martin,

On behalf of the Oregon's State Interoperability Executive Council (SIEC), we urge the Commission to consider the following comments as they relate to the 700 MHz D-Block Spectrum and the creation of a national public safety interoperable voice and data network.

Successful command and control of major emergency incidents and ever increasing day-to-day public safety operations require immediate access to reliable and robust radio signals by all responders to ensure a well-coordinated, multidisciplinary approach. Currently, mission-critical operations cannot be impeded by today's technology tools and responder safety is threatened by the inability to readily communicate between individual "patchworked" systems. For that reason, coupled with the SIEC's efforts to improve Oregon's interoperability statewide, we advocate for the creation of a seamless, wireless, broadband public safety radio communications network with sufficient and priority access for data transmissions.

Since the tragic events of September 11, 2001, the aftermath of Hurricanes Rita, Wilma and Katrina, and the devastating wildfires in California, it has become critically apparent that America's public safety community must have a seamless, interoperable voice and data network. Through the auction of the D-Block spectrum, a solution to this need can become a reality. The important areas that we feel must be addressed include:

- Convene a one-year "NPSPAC" like advisory committee to develop a nationwide strategy for integrating the existing State Communications Interoperability Plans (SCIPs).
- Join efforts with State SIECs in a coordinated approach to interoperability.
- Reduce or eliminate the lowest bid requirement, yet ensure that the successful bidder has the resources to build, operate and maintain the network.
- Place strong consideration on the development of a Statement of Requirements for the national system and how it will function with state and regional networks.
- Provide flexibility for local build-out and integration into the system in areas where the nationwide system will be delayed or non-existent.
- Ensure the Public Safety Broadband Licensee (PSBL) has the authority equal to its responsibility in constructing the network that meets the requirements of public safety reliability, redundancy and coverage.
- Reject any proposals that advocate rescinding the license of the Public Safety Spectrum Trust (PSST).
- Ensure the PSST has the resources necessary to execute its mission throughout the process of development, construction and deployment of the network.

I cannot overstate the importance the Oregon SIEC places on building this long overdue network. We believe that the Commission has a once in a lifetime opportunity to create this network in a public/private partnership in concert with Oregon's current statewide efforts, and we urge the Commission to do so.

Respectfully,

Chief Jeffery D. Johnson
Chair, Oregon State Interoperability Executive Council