

**International Association of Fire Chiefs
4025 Fair Ridge Drive
Fairfax, VA 22033-2868**

November 12, 2008

Submitted Electronically

Re: WT Docket 06-150, Service Rules for the 698-746, 747-762 and 777-792 MHz Bands, PS Docket No. 06-229, Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band; NOTICE OF ORAL EX PARTE COMMUNICATIONS

Dear Ms. Dortch:

Pursuant to the provisions of Section 1.1206 of the rules of the Federal Communications Commission (“FCC” or “Commission”), I hereby submit a notification of *ex parte* communication between myself, William Brownlow and the FCC’s staff. We are, respectively, the representatives to the Public Safety Spectrum Trust (“PSST”) of the International Association of Fire Chiefs (“IAFC”) and the American Association of State Highway and Transportation Officials (“AASHTO”). Mr. Brownlow and I also communicated the views of the individuals who represent the American Hospital Association (“AHA”), the Forestry Conservation Communications Association (“FCCA”), International City/County Management Association (“ICMA”), the International Municipal Signal Association (“IMSA”), National Association of State EMS Officials (“NASEMSO”), National Fraternal Order of Police (“NFOP”), National Governors Association (“NGA”) and National Sheriffs Association (“NSA”) to the PSST.

In particular, on November 12, 2008, Mr. Brownlow and I met with Angela E. Giancarlo, Chief of Staff & Senior Legal Advisor, Wireless & International, to Commissioner Robert M. McDowell regarding the above referenced proceedings. We expressed concern that the FCC has proposed to regulate the 700 MHz public safety broadband licensee (“PSBL”) in a manner that is not in the public interest. The FCC has proposed to require the election of a new executive committee within 30 days of adoption of an order issuing final rules in this proceeding and has proposed that no current executive committee member may be re-elected to the same position on the committee.

We pointed out that these rules, if adopted, would seriously hamper the effectiveness of the PSBL. The FCC has not demonstrated why the proposed rule changes are necessary. The current Chairman and CEO of the PSBL has been an invaluable asset in representing the PSBL. He has the strong support of the organizations we represent. The FCC should not impose artificial limits on the term or authority of the PSBL Chairman and should, instead, allow the PSBL to manage itself and permit the Chairman (and Interim CEO) of the PSBL to complete his term, as prescribed by the PSBL’s bylaws.

We also expressed concern that the FCC's proceeding might discourage the PSBL's current and future use of Cyren Call Communications ("Cyren Call") as its advisor. Cyren Call provides valuable guidance to the PSBL through its real-world experience. As the process of negotiating a Network Sharing Agreement ("NSA") proceeds, we will particularly need to rely on the expertise of Cyren Call. The Commission should not impede the ability of the PSBL to choose its own advisors and should permit it to continue to retain Cyren Call. If there are questions regarding the foregoing, please contact the undersigned.

Very truly yours,

/s/ Alan Caldwell

Alan Caldwell

cc: (electronically)
Angela E. Giancarlo