



November 19, 2008

Marlene H. Dortch
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Service Rules for the 698-746, 747-762 and 777-792 MHz Bands, Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band
Docket Nos. 06-150 and 06-229

Dear Ms. Dortch:

As a regional council for EMS/Hospitals/public safety organizations responsible for emergency support functions in twenty-two counties in and around San Antonio Texas, we have been closely following the FCC's deliberations on how to best create a public safety network in the 700 MHz band. Based on our experience, we believe that a readily accessible satellite component should be part of the public safety network. Satellites have repeatedly demonstrated their ability to provide critical public safety communications during emergencies when terrestrial communications have failed or otherwise have been limited. For example, during and after Hurricane Katrina, as well as the more recent Hurricane Ike, our terrestrial communications infrastructure failed, but our satellite devices were still functioning in the storm-ravaged areas. This allowed us to continue to provide mission critical public safety services. Without this capability, our public safety personnel out on Galveston Island would have been completely cut off from the rear command structures and the ability to call for additional help. Further, the personnel on the island would have been tethered to the 4-5 miles radius of command vehicle communications solutions, which would have significantly impacted rescue and EMS operations negatively.

The ability of satellites to provide ubiquitous coverage also ensures that public safety personnel will have immediately available broadband capacity no matter where they are. This is especially important for public safety organizations that are in rural or remote areas like many of our EMS agencies out to the west of San Antonio and either will not have terrestrial network coverage or will not have such coverage for many years.

We are pleased that the FCC has proposed to retain the requirement for D Block licensees to make available at least one integrated, satellite-terrestrial device and to grant licensees flexibility in meeting certain network resiliency and coverage requirements for incorporating a satellite component in the shared 700 MHz public/private broadband network. Nonetheless, we believe that the Commission's proposals, although a step in the right direction, do not go far enough. Instead, the FCC should require that satellite capability be incorporated into every 700 MHz public safety device, rather than just a single handset. A single device may be adequate for

a voice-only network, but public safety broadband network users will need to rely on a variety of devices in different forms in order to meet their operational needs. Such a requirement will also ensure that the network has back-up capability and provides ubiquitous coverage, both of which are critical for a public safety network.

Please feel free to contact us if you have any questions.

Very truly yours,

Eric Epley, Executive Director
Southwest Texas Regional Advisory Council
San Antonio, Texas