

In the matter of FCC 10-72, I support the NPRM.

In the matter of part 7, I wish to respond on the Commissions request for comment.

7. Furthermore, we propose that the emergency tests and drills must be sponsored by Federal, state, or local governments or agencies, in order to limit the narrow exception to ensure that drills further public safety. We note, however, that there may be circumstances where conducting emergency drills for disaster planning purposes, even if not government-sponsored, would serve the public interest. Accordingly, we seek comment on whether we should permit employee operation of amateur stations during non-government-sponsored emergency drills, if the purpose of the drill is to assess communications capabilities, including amateur radio, in order to improve emergency preparedness and response.

The following are guidelines from the Commissions web pages.

Public Safety and Homeland Security Bureau

Emergency Planning: Health Care Sector

Hospitals, clinics, nursing homes, and other health care facilities offer vital services to the public, especially during and immediately following an emergency. These facilities therefore should have in place an emergency plan to reduce the disruption of essential services when an emergency situation occurs.

- **Communications response team.** Develop a team that will take action during and following an emergency. This task must clearly define employee roles and responsibilities and establish a chain of command for operational functions and maintenance of communications infrastructure and IT services.
- **Employee training exercises.** Conduct training for all phases of an emergency. Where feasible, consider doing cross training between communications team members to be

able to compensate for personnel shortages that may occur. Include specialized training for employees with disabilities and those who work with them.

- **Communications leader training.** Conduct training for those responsible for coordinating communications operations during major emergency events.
- Consider HF radio as an option, recognizing that HF usually requires a skilled operator such as a licensed HAM radio operator. It is advisable to identify and include HAM radio operators in your emergency operations plan and when activated, identify where they will be assigned. It is important to include all known HAM, Amateur Radio Emergency Service (ARES), and SHARES operating personnel in the area to maximize their assistance during critical times.

Examine the vulnerability of each communications service provider's infrastructure and facilities and consider the use of alternate providers.

- Periodically test all redundant communications systems.

Remember that **failing to plan is planning to fail.**

Allowing Hospitals and other NGO's to have their own drills separate from Government Organizations will give these entities the flexibility to train per the above guidelines.

Respectfully submitted by

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