

May 24, 2010

Mr. Jeff Cohen
Public Safety and Homeland Security Bureau
Federal Communications Commission
Washington, D.C.
Jeff.Cohen@fcc.gov

WP Docket No. 10-72

Dear Sir:

I have supported hospital communications during crisis events for over twenty years as an amateur radio operator. During some of these events, I was an employee of the hospital I was supporting. Being an employee of an organization during a crisis event involved with communications is a benefit, as you know the staff and the facility and you have a general idea of the emergency preparedness plan. This information can be invaluable during a crisis event. My involvement has always been considered voluntary and beyond my normal job responsibilities. In a medical crisis, many are working toward a common good of patient care. Being a non-clinician and able to staff radios, so medical staff can treat patients is considered a valuable "lesson learned".

Recently, the American Hospital Association initiated (Docket 10-54) and the FCC has requested (Docket 10-72) comment on employees participating in communications drills on behalf of an employer. And more specifically wording related to government sponsored drills. I am broadly in favor of maintaining the practice that I have been performing for over twenty years and supporting my employer. As many drills are not government sponsored, the ability to not include this wording is critical. In the current economic and risk management climate, getting a governmental agency to commit to sponsorship of a drill, with its potential for additional staff time and legal exposure may not be possible. Since some healthcare organizations span multiple counties and even multiple states, preparing a government sponsor for these multi governmental regions may be near impossible.

While I know amateur radio works and amateur radio in healthcare crisis communications in many parts of the country have the highest standards, I am concerned when communications vendors market amateur radio for a more general gain. Marketing information, such as the example below may provide serious disservice to the amateur community as well as the emergency preparedness community. The FCC must choose its wording in relation to this action very specifically. Many people and organizations have presented superb information for FCC inclusion. I request that the FCC assure continued fostering of the amateur radio public safety mission while assuring that marketing of spectrum and skills is minimized.

Sincerely,

Duane Mariotti
WB9RER

The PUSH TO TALK ORGANIZATION gets the message.

Disaster preparedness/ emergency planning is a multi-faceted beast to conquer. Amateur radio "Ham" operators WB6SLC, WB6DYM, AF6HP, N6ENL, KF6FGA, N6ENL, and others founded the PTT Organization. We know how important it is to bring in all of the available resources when disaster strikes.

Here are some points to consider:

- Radio systems designed to be in the same frequency band next to amateur radio "HAM" operators can cross-function and reach even more assistance.
- Radios can do double-duty when called upon and operate BOTH bands requiring a simple HAM license to use both frequencies (see www.arrl.org for more).
- Not a licensed HAM operator? There are LOTS of them out there that can operate the interlinks for you and there is NEVER a charge for the service.
- Wireless carriers are notorious for domino type failures during even slight emergencies. Reduced dependency on them makes your operation hardened against communications loss.
- The federal, state and local agencies can commandeer the wireless carriers during an emergency but **NOT yours or ours.**
- Small or large; you need to "OWN a piece of the network"©. With PTT Digital you can do that.
- One-size DOES fit all with digital communications since all departments can have the same type of radio (translation: economies of scale = low cost).
- All facilities in a multi-campus operation can use the same radio type.
- Have multiple radio channels at one or more of your facilities? Pool the resources and in case one fails the rest take up the load automatically...ask us HOW!
- Facilities can inter-operate for self-preservation during a crisis by Radio Over IP (RoIP) communications on your own Local Area or Wide Area networks.
- Assistance from one facility can be rapidly brought to another.
- Common "hailing" or all-call channels can be maintained separate from others.
- External-networks are available for backup, redundancy and contingency planning; the Push To Talk Organization can be YOUR backup plan using the same radio.
- You simply rent airtime on the wide-area network and never maintain or license it...just switch the radio to the "Wide Area" channel and talk.
- If the Internet goes down each site operates independently for failure-proof local operation.

Push To Talk Digital Radio Systems have engineered-in failure hardening elements designed to overcome the issues outlined above.

Local professional 2-way radio technicians will meet with you to evaluate, design, install and maintain it to suit your exact needs.

Never pay for features you don't need and won't help you in emergency situations:

- SMS Texting is a one-to-one messaging format; useless in a crisis.
- Digital 2-way radio is One-To-Many for instant alerting and notification.
- E-Mail is not a fast or secure way to alert people of an issue.
- Private 2-way radio networks can be voice-logged for administrative review, wireless carriers can NOT be logged or monitored which means ABUSE.
- You can talk over your own network all you want at NO COST, there is no per-minute charge on YOUR OWN system.
- Communicate from a PC, handheld, base or mobile radio that you control 100%.

PTT radios are programmable to cross-connect into the local Amateur Radio "HAM" operators community for emergency preparedness, disaster recovery, etc.

Communicating on the Amateur Radio channels requires a simple FCC license.

Click Here.  [American Radio Relay League](#) for assistance with licensing.