



Ohio Statewide Interoperability Executive Committee  
Ohio Office of Information Technology  
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July 15, 2011

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12th Street, SW  
Washington, DC 20554

Re: WT Docket 96-86, RM-11433

Dear Madam Secretary:

The Ohio Statewide Interoperability Executive Committee (SIEC) has reviewed the Petition for Rulemaking filed by the National Public Safety Telecommunications Council (NPSTC) on behalf of the State of Maryland to allow aircraft voice operations on secondary Trunking channels in the 700 MHz band, RM-11433, and is pleased to offer these comments.

NPSTC is correct in their belief that Maryland is not unique in the problem of aircraft operations, not only at 700 MHz but 800 MHz and indeed other bands as well.

The Ohio State Highway Patrol has a very active air service, both for its own mission of providing police traffic services, but also providing assistance to other state, county and local departments. Besides speed enforcement, they are often called upon to aid in man-hunts, lost children and elderly searches, rural area rescue missions, illegal drug eradication, blood, organ and body tissue relays, general surveillance missions and other law enforcement needs. The state Departments of Natural Resources and Transportation also operate aircraft in the furtherance of their missions as well and are sometimes called upon to assist other agencies.

A number of major city and county agencies operate aircraft as well as close to a dozen airborne EMS companies and all are frequently called upon for mutual aid or medical evacuation services involving the need for radio interoperability services. Political boundaries, whether they are city, county or state, are often crossed without regard in the performance of their life-saving missions, so adjacent state pre-planning would be of great benefit.

The problem of interoperability between agencies is as old as radio communication itself. Several methods have been developed over time and, on occasion, ad-hoc methods are implemented, but there has never been a clear, concise and uniform nationwide manner in which to conduct these operations. If the Commission approves this petition and issues a rule-making proceeding, with everyone's input and assistance, perhaps such a protocol can be developed.

Direct costs to participate should be minimal - the frequencies involved would likely be programmed in most, if not all, subscriber units. State and local agencies would provide the infrastructure as an integral part of their overall system design.

In Ohio, secondary use trunking channels are in use very little, if at all. It is doubtful that our public service agencies would be interested in expanding this option.

The Commission has designated the Ohio Statewide Interoperability Executive Committee (SIEC) to oversee the use of the 700 MHz Interoperability channels. Ohio's SIEC is active in this regard and has, un-officially, provided general guidance and offered suggestions concerning interoperability in other bands as well. We would gladly participate with our neighboring states in a coordinated plan to make the best possible use of the 700 MHz Interoperability channels and attempt to minimize interference between all concerned.

The Ohio SIEC supports and endorses the NPSTC / Maryland Petition for Rulemaking, RM-11433, as it is clearly in the public interest.

If you need further clarification on our position, please call me at 614-207-4453.

Respectfully submitted,

Darryl L. Anderson  
Administrator  
Ohio SIEC