

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20054**

In the Matter of )  
 )  
47 CFR §90.531(b)(7) ) RM-11433  
 )  
Request for Waiver to permit operation of )  
Air-to-Ground radio equipment on 700 MHz )  
Secondary Trunking Channels by the State of )  
Maryland )

To: Chief, Public Safety and Homeland Security Bureau  
Federal Communications Commission

**COMMENTS OF THE  
MARYLAND INSTITUTE FOR EMERGENCY MEDICAL SERVICES SYSTEMS**

The Maryland Institute for Emergency Medical Services Systems (“MIEMSS”) hereby submits comments to the Federal Communications Commission’s Public Safety and Homeland Security Bureau in response to the above-captioned matter.<sup>1</sup> MIEMSS reviewed the Maryland Request for Waiver and believes that the Waiver is necessary. The waiver would allow Maryland to use the 700 MHz band secondary trunking channels for air-to-ground interoperable radio communications.

MIEMSS is the independent agency of the State of Maryland that oversees and coordinates all components of the statewide emergency medical services (“EMS”) system in

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<sup>1</sup> Public Notice, *Public Safety and Homeland Security Bureau Seeks Comment on Petition for Waiver of Rules Filed by the State of Maryland Requesting Permission to Operate Air-To-Ground Radio Equipment on 700 MHz Secondary Trunking Channels*, RM-11433, DA 12-602 (April 17, 2012). See also *Petition for Waiver of Rules filed by the State of Maryland*, RM-11433 (February 24, 2012) (“Maryland Request for Waiver”).

accordance with Maryland's statutes and regulations. Maryland's statewide EMS system is a highly integrated and coordinated regionalized system of emergency care that includes Public Safety Answering Points ("PSAPs"), emergency medical services, hospital emergency departments, as well as trauma and specialty centers. Statewide EMS communications are essential to the real-time integration of these resources to ensure that patients who are severely injured or critically ill get the right care, in the right time, and at the right facility so that all of these life saving components are accomplished in the safest and most effective way.

MIEMSS currently operates a statewide medical communications system with a 24/7 operations center (SYSCOM) that dispatches helicopters and ensures coordination between helicopters, emergency departments, trauma and specialty centers, PSAPs, and field EMS providers. Maryland is developing a statewide 700 MHz trunked communications system, and it is essential that MIEMSS maintains air-to-ground communications capabilities to dispatch and coordinate the air resources of the Maryland State Police Aviation Command ("MSPAC"), as well as private air medical services that the State may dispatch when MSPAC resources are not available or during mass casualty and catastrophic medical incidents. The State's use of old analog low-band communications must be replaced with modern state-of-the-art digital communications to ensure interoperability and reliability throughout the system.

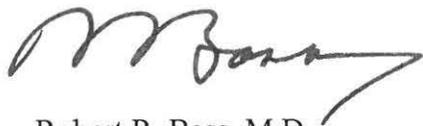
Further, there is a continuing need for trauma and specialty care hospitals to communicate with helicopters to guide patient care and transport destination decisions. Medical direction from hospital base stations to EMS providers treating the patient allows providers to consult directly with physicians on treatments needed before the patient arrives at the trauma or specialty care hospital. Communications with the hospital that will receive the patient are

essential to ensure that patients are flown to hospitals with the capability and expertise to provide timely, life-saving, and effective treatment.

Finally, from a safety standpoint, air medical services in the United States have experienced an increase in the number of crashes in the past two decades that has resulted in investigations and recommendations by the National Transportation Safety Board. A particularly high-risk aspect of a medical helicopter mission involves the landing in areas that are not under the control of FAA air traffic control personnel. In those instances, there are public safety personnel typically already on scene who may provide vital safety information to the pilots who may be attempting to land the aircraft in unfamiliar locations and under various conditions, including nighttime. Having a channel available for ground personnel to provide the helicopter pilot with information regarding hazards and conditions in the landing zone could significantly reduce the likelihood of serious mishaps.

For the foregoing reasons, MIEMSS submits this comment in strong support of the Maryland Request for Waiver.

Very truly yours,

A handwritten signature in black ink, appearing to read "R. Bass", with a long, sweeping horizontal stroke extending to the right.

Robert R. Bass, M.D.  
Executive Director  
Maryland Institute for Emergency Medical Services Systems