

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
The State of Louisiana)	PS Docket 06-229 and WT 96-86
Safety Network in the 700 MHz Band)	
)	
Request for Waiver of the Commission's Rules to)	
Narrowband the 700 MHz Radio Frequency Spectrum)	
)	

WAIVER – EXPEDITED ACTION REQUESTED

Pat Santos
Chairman
Statewide Interoperable Executive Committee
7667 Independence Blvd
Baton Rouge, LA 70806

July 3, 2012

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SUMMARY

By this petition, the State of Louisiana asks the Commission to waive the 700 MHz 6.25 kHz equivalency established by the FCC rules outlined in FCC 90.535 with an effective date of December 31, 2016 for the State of Louisiana and expeditiously grant a waiver that will allow the State to maintain and operate the Louisiana Wireless Information Network (LWIN) in the current 12.5 kHz equivalency through December 31, 2024.

Since 2005, Louisiana has spent over \$165 million in Federal and State funds building a statewide radio system that is currently providing 95% on street portable radio coverage to over 67,000 users. The \$165 million does not include the millions of dollars that have been spent at the local level in procuring subscriber units to operate on LWIN. Today LWIN is the largest statewide radio system in the country and has been recognized as a best practice by Federal agencies and has been featured in several articles by the media.

The great success in interoperability that has been achieved in Louisiana is currently being threatened by the pending December 31, 2016 6.25 kHz equivalency that has been mandated by the FCC. A recent analysis conducted by the State of Louisiana suggests that it would cost Louisiana over \$417 million in infrastructure and subscriber units to meet this mandate. The cost to upgrade LWIN to meet this mandate is not feasible or manageable for the State of Louisiana and its local political subdivisions. Due to the enormous costs associated with this pending mandate, local political subdivisions throughout Louisiana have begun looking at alternative solutions that would not require them to abandon their current investments in subscriber units which include building disparate systems utilizing strictly 800 MHz frequencies which would reduce current capacity and potentially force parishes within the Greater New Orleans area to look at upgrading existing systems and establish mission critical voice communications outside of LWIN. The net effect of this mandate could potentially reverse the progress made in Louisiana in regards to interoperable communications.

Section 1.925 of the Commission's rules provides the Commission with the authority to grant waivers if one of two conditions can be demonstrated: "The Commission may grant a request for waiver if it is shown that: (i) the underlying purpose of the rule(s) would not be served or would be frustrated by application to the instant case, and that a grant of the requested waiver would be in the public interest (ii) in view of unique or unusual factual circumstances of the instant case, application of the rule(s) would be inequitable unduly burdensome or contrary to the public interest, or the applicant has no reasonable alternative." Louisiana believes that both demonstrations can be demonstrated. While fully explained

below, Louisiana believes it is not in the public's interest to expend over \$417 million to meet this mandate as no significant advantage would be achieved in Louisiana by adding more frequencies as LWIN is already meeting mission critical voice communication requirements for its first responder community. In addition, due to the staggering cost of upgrading LWIN this rule provides an undue burden on the State and ultimately is not a realistic alternative for the State and its local political subdivisions to pursue.

For these reasons, the State of Louisiana seeks Commission approval for a waiver granting the State of Louisiana the authority to operate with the existing 12.5 kHz equivalency through December 31, 2024. Such an extension would allow the first responder community the opportunity to realize the full potential of limited resources and optimize the life of current subscriber units and infrastructure. If granted, this extension will allow agencies sufficient time for their existing subscriber units to go through their natural replacement cycle and slowly begin to replace current inventory of subscriber units with subscriber units that will ultimately meet the 6.25 kHz equivalency once that standard has been developed.

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WAIVER – EXPEDITED ACTION REQUESTED

I. INTRODUCTION

In late 2009, the State of Louisiana submitted a Petition for Rulemaking with regard to existing FCC rules outlined in FCC 90.535 which requires 700 MHz systems achieve a 6.25 kHz equivalency from its current 12.5 kHz equivalency by December 31, 2016. In that Petition, Louisiana requested that the mandatory transition deadline for 6.25 kHz channel efficiency in the 700 MHz spectrum be modified from December 31, 2016 to a date of December 31, 2024. The issue of 6.25 kHz channel efficiency has been a significant concern of the users of the Louisiana Wireless Information Network (LWIN) since the rules were originally adopted as evident by the filing of the Petition for Rulemaking in 2009. Since the filing of the petition state and local agencies have been struggling with whether to purchase a subscriber unit that they know will be capable of meeting this requirement at a significantly increased price or purchase a more affordable subscriber unit that may be obsolete within five years. This issue has recently reached a breaking point as our largest parish is looking at alternative solutions to upgrading every subscriber unit in their current inventory. In doing a cost benefit analysis, the most affordable option for this parish is to update a Tier II 800 MHz radio system in order to avoid having to replace all of their existing subscriber units. While this option has the potential to provide a more economic solution to this parish, it would mean that they would in effect be breaking away from LWIN and creating their own disparate radio system that would not provide the same level of interoperable communications that exist today. Furthermore, this action has the potential to impact the entire Greater New Orleans region (Homeland Security Region 1) as the other parishes in that region and possibly the two adjacent regions (Homeland Security Regions 3 and 9) would likely follow suit in order to avoid having to meet this FCC

requirement. Due to the pressing need to provide an answer in regards to the 6.25 kHz channel efficiency mandate, Louisiana is asking that the FCC provide a waiver to the State of Louisiana that would allow users on LWIN to operate in the 700 MHz spectrum with the current 12.5 kHz channel efficiency through December 31, 2024.

II. BACKGROUND

Louisiana faced a major challenge in developing an interoperable communications system within a landscape that is highly vulnerable to multiple weather events of catastrophic proportion. In order to meet this challenge, the State of Louisiana created The Statewide Interoperability Executive Committee (SIEC) to establish and govern a P25 statewide shared communication system. The SIEC is made up of twenty members who include regional representatives from all nine homeland security regions identified throughout the State. Unlike most state governing bodies which are heavily tilted with membership from state agencies, Louisiana purposely provided seventy five percent of the voting members to local and first responder association representatives. This governing body has provided governance and has overseen the building of the Louisiana Wireless Information Network (LWIN), which is based on the 700 MHz allocation of spectrum designated for use by Public Safety.

At the time of the State's original filing of the Petition for Rulemaking, LWIN consisted of 43,329 users and 87 active sites. Today LWIN consists of 67,162 users making it the largest statewide radio system in the country. LWIN consists of 118 sites which provide approximately 95% on street portable radio coverage across the State of Louisiana while also providing approximately 95% in building coverage to our nine largest metropolitan areas. To achieve this high level of interoperability, the State of Louisiana has spent an unprecedented amount of funds in establishing LWIN. To date, a total of \$165,000,000 including over \$80,400,000 state general funds, has been expended by the State in the purchasing of infrastructure, subscriber units, professional services, and other costs dedicated to this effort.

In order to encourage migration and usage from existing disparate systems to the LWIN system, the State continues to appropriate funding to cover 100% of the costs associated with LWIN administration, maintenance and operation. Local first responder agencies are not assessed fees to access LWIN. To date there are over 67,000 users on LWIN from Federal, State, Local, and volunteer agencies with local users comprising approximately seventy (70) percent of LWINs users. Collectively, these agencies have expended over \$167,000,000 to purchase subscriber units to use on LWIN.

III. LWIN AS A RECOGNIZED BEST PRACTICE

Over the last several years, Louisiana has achieved an unprecedented level of interoperability. LWIN was first utilized and stressed during Hurricane's Gustav and Ike in 2008. During Hurricane Gustav, LWIN experienced over six million push to talks during a ten day period in which Louisiana executed what is believed to be the largest evacuation in the country when the projected path of Gustav dictated for the first time Louisiana evacuate its entire coast line. During the BP Oil Spill in 2010 Louisiana provided access to LWIN to the United States Coast Guard and led the way in connecting LWIN to the Mississippi Wireless Information Network, the radio system in Orange Beach County, Alabama, and systems in Beaumont, Harris County (Houston), Austin, and Corpus Christi, Texas which effectively provided voice communications to the Coast Guard from Corpus Christi, Texas to Pensacola, Florida. Within 24 hours of offering an interoperable solution to the U.S. Coast Guard, this new system, now called GulfWIN, was established and operational within 24 hours from Louisiana to Orange Beach, Alabama. Also, due to an unprecedented level of cooperation between Louisiana, Mississippi, and Orange Beach, Alabama all three disparate sites shared radio IDs which allowed the U.S. Coast Guard to talk on any of the three systems from any location in which coverage was available on a single radio. Once oil projections from NOAA began predicting oil from the Macondo Well would ultimately reach Texas, an additional five disparate radio systems in Texas were connected to GulfWIN utilizing a Project 25 Inter-RF subsystem interface (ISSI). Because the Louisiana and Mississippi have a permanent hardware connection that provides a bridge to each system, GulfWIN is still operational today. GulfWIN has recently been further expanded by providing a permanent bridge between Louisiana and Arkansas which was recently tested during a joint exercise where the EOC in Baton Rouge, LA and the EOC in Little Rock, AR were able to transmit voice communications over the connected radio systems. Furthermore, during the ten year anniversary of the tragic events of 9/11, the Department of Homeland Security recognized Louisiana as one of five case studies in which interoperability has been achieved.

IV. IMPACT OF THE 6.25 kHz CHANNEL EFFICIENCY MANDATE

The State of Louisiana recognizes the FCC's desire to create a more effective use of the 700 MHz spectrum and in general supports this initiative where it makes sense. Louisiana has completed the build out of LWIN using the available spectrum in the 700 and 800 MHz blocks. While 6.25 kHz channel efficiency would double the amount of available frequencies in Louisiana at this time the State of Louisiana does not need additional spectrum. The last major expansion of LWIN was completed in January 2012 in which additional capacity was added to every site where LWIN is expected to experience additional growth. This capacity expansion is expected to meet the continued growth of LWIN over the next ten years. LWIN has achieved an extremely high rate of efficiency with the frequencies that are

currently available to Louisiana. Over the last ninety days LWIN has experienced on average 10,684,089 push to talks a month while only experiencing an average of 555 busies which equates to a 99.9999% first time push to talk success rate. As the facts demonstrate, LWIN has managed quite successfully with the spectrum that is already available.

A concern raised to Louisiana is the possibility that a public safety entity would require frequencies in the 700 MHz spectrum which the 6.25 kHz channel efficiency mandate would provide. In order to meet the spectrum requirements to support the first responder community, LWIN utilizes both State and General Use 700 MHz frequencies. The overwhelming majority of frequencies are licensed by the State on behalf of all the users on LWIN. Since LWIN has began deployment there has not been a single public safety agency that has requested access to a 700 MHz General Use frequency outside of LWIN. While there are still occasionally new radio systems that are being built or upgraded, nearly every single one uses frequencies in the VHF or UHF spectrum. Typically these systems are being deployed by rural fire departments that are dependent on the ability of these systems to provide multiple tones which is currently not a feature that is available on LWIN.

In order to determine the impact the 6.25 kHz channel efficiency mandate will have on LWIN and the cost associated to bring LWIN in compliance, an analysis has been conducted on the replacement cost of subscriber units and upgrade costs for LWIN infrastructure. In completing the analysis for the 6.25 kHz channel efficiency mandate upgrade, we looked at the following components of LWINs infrastructure: Zone Cores, which LWIN has four (4); Simulcast sites, which LWIN has three (3), standalone repeater sites which LWIN has one hundred fifteen (115) and consoles.

The State of Louisiana recently executed a purchase order to upgrade LWIN, which utilizes an ASTRO 25 system, from System Release 7.9 to System Release 7.13. System Release 7.13 will support time division multiple access (TDMA) requirements which means all four (4) zones will be compliant. The Northern and Southern Simulcast system that provides coverage to the Greater New Orleans Metropolitan area is not TDMA compliant and will require both hardware and software upgrades. The Baton Rouge simulcast system is TDMA compliant and will not need to be upgraded. Twenty one (21) of the one hundred twelve (112) standalone repeaters sites currently do not meet the TDMA requirements and would require hardware replacements. These twenty one (21) sites have a total of one hundred ninety six (196) channels that would need to be replaced. Finally, one hundred fifty six (156) consoles spread across forty-two (42) dispatch centers currently deployed across the state are not TDMA compliant and will need to be replaced. The total cost in infrastructure to meet the 6.25 kHz channel efficiency requirement is approximately \$120,087,689.

The other major requirement in order to meet the 6.25 kHz channel efficiency mandate is the replacement of subscriber units that currently do not support the TDMA requirements. In order to develop an approximation of the replacement costs for existing subscriber units the cost of a base Motorola APX, which has hardware that is compatible with TDMA requirements, subscriber was used. It must also be noted that while the APX is technically capable of meeting the TDMA requirement, it currently is not fully compatible because the Phase II TDMA standards have not been developed. The practicality of this means that each of the APX radios will have to receive a software upgrade once the standard has been developed incurring an additional cost for each subscriber to be flashed over to meet TDMA standards. This cost has also been included in the analysis of the subscriber units. In addition to the 67,162 radios that would be required to be replaced, there are also 350 consolettes that would require replacement as well. The anticipated cost of replacing all subscribers and consolettes is \$296,932,554.

Taking into consideration both the infrastructure and subscriber replacement costs, the 6.25 kHz channel efficiency mandate imposed by the FCC is expected to cost the State of Louisiana approximately \$417,020,243. If the State of Louisiana was to upgrade LWIN to meet the 6.25 kHz channel efficiency requirement other than having the ability to support the 6.25 kHz channel efficiency, no additional significant advantage over what LWIN is currently providing to its users today would be achieved!

V. REQUEST FOR EXPEDIATED WAIVER

The State of Louisiana requests that the Commission grant Louisiana a waiver that would permit the State to operate in the 700 MHz 12.5 kHz channel efficiency until December 31, 2024. The Commission can “waive specific requirements of the rules on its own motion or upon request.” Specifically, Section 1.925 of the Commission’s rules provides the Commission with the authority to grant waivers if one of two conditions can be demonstrated. As described more fully below, the State of Louisiana meets both conditions.

Rule 1.925 states that “The Commission may grant a request for waiver if it is shown that: (i) the underlying purpose of the rule(s) would not be served or would be frustrated by application to the instant case, and that a grant of the requested waiver would be in the public interest.” The purpose of the 6.25 kHz channel mandate is to allow for a more efficient use of the 700 MHz spectrum dedicated to public safety. As clearly demonstrated earlier in this request, LWIN is fully built and operational across the State of Louisiana and is already using available spectrum to provide mission critical voice communications to its first responder community. The cost to build new radio systems for the reconfigured 700 MHz spectrum is cost prohibitive and any new system in Louisiana within the last six years has been built to operate in the VHF and UHF spectrum. While the 6.25 kHz channel efficiency

mandate was intended provide greater efficiency and access to spectrum, both aims have already been achieved in Louisiana. Because the underlying purpose of the rule has already been achieved, it is not necessary to subject the State of Louisiana to the new efficiency standard. With the 6.25 kHz channel efficiency mandate quickly approaching, local municipalities are considering alternatives to providing mission critical voice communications to first responders because the cost to replace their entire inventory of subscriber units in order to achieve compliance with the Commission's narrowbanding mandate is cost prohibitive. The practical effect of the narrowbanding mandate is that the State's largest homeland security region, Greater New Orleans, may leave LWIN and build a separate, incompatible 800 MHz radio system. This plan is being driven solely by the approaching 6.25 kHz channel efficiency deadline and the cost to comply. Should the Greater New Orleans region elect to build an 800 MHz radio system, it would represent a significant step backward for the State of Louisiana with respect to interoperable communications. By comparison, a fireman from Northwest Louisiana using LWIN today can immediately speak with a fireman in New Orleans through common talkgroups, which must be programmed in every subscriber unit in LWIN, upon receiving a mutual aid request. This capability would be significantly degraded if the Greater New Orleans region were to break away. As a result, the public's best interest would not be served as ability of first responders from cross jurisdictional boundaries to communicate during times of emergencies would be severely diminished.

Rule 1.925 also states that the Commission may grant a waiver if it is shown that: "(ii) in view of unique or unusual factual circumstances of the instant case, application of the rule(s) would be inequitable unduly burdensome or contrary to the public interest, or the applicant has no reasonable alternative." The State of Louisiana has clearly demonstrated that the impact of this rule would be unduly burdensome. Based on the State's best analysis, the estimated cost of meeting the 6.25 kHz channel efficiency requirement would be in excess of \$417,000,000. The cost of meeting the Commission's mandate would exceed the total amount the State spent to build LWIN and equip the first responder community with more than 67,000 subscriber units. Even after spending more than \$417,000,000 the State of Louisiana would be no better off than it is with its current radio system. Moreover, the unnecessary expense incurred to the State of Louisiana and its local municipalities as a result of the Commission's mandate would be not be in the public interest given the current fiscal challenges confronted by the State and municipalities, which have seen their federal funding shrink in recent years. Because there is no significant advantage gained in Louisiana by meeting the Commission's mandate and because LWIN already meets the mission critical voice communications for its first responder community, it is not in the public interest to spend \$417 million at a time when the State is so fiscally challenged.

Assuming arguendo that the State sought to meet the 6.25 kHz channel efficiency requirement, the State could not muster the funding necessary to implement the upgrades. While the Greater New Orleans Region is considering an alternative plan to enhance its existing 800 MHz system, doing so would undermine the six years of progress made toward achieving interoperability that has yielded the largest and most advanced interoperable system in the country. If the Greater New Orleans Region were to break from LWIN, the State of Louisiana would be taking a significant step backward in interoperable communications in what first responders recognize as the most disaster prone state in the country. Even if the Greater New Orleans Region chose a separate radio system, the remaining LWIN users would not be served by that region's solution. As previously noted, there is no available funding to upgrade LWIN or its subscriber units to meet the 6.25 kHz channel efficiency requirement. LWIN currently relies on both 700 MHz and 800 MHz frequencies to meet the needs of the first responder community with more than 75 percent of those frequencies in the 700 MHz spectrum. Louisiana's only realistic alternative would be to drop the 700 MHz frequencies and rely strictly on 800 MHz frequencies which would in effect diminish the State's ability to handle the capacity needs of providing mission critical capability to our first responders. As a result, Louisiana has no realistic alternative to meet the 6.25 kHz channel efficiency requirement.

VI. CONCLUSION

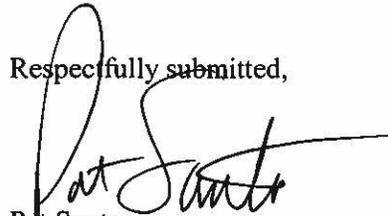
During the past six years, the State of Louisiana has spent more than \$165 million to build the largest statewide radio system in the country. Based on the fact that a significant portion of LWIN's infrastructure and nearly every subscriber unit on the system do not support the 6.25 kHz channel efficiency, the approaching December 31, 2016 deadline prematurely and artificially shortens the life cycle of the State's and municipalities' existing equipment and LWIN as a standalone system. The cost to upgrade the equipment is cost prohibitive for the State and its local jurisdictions. As such it is imperative that the Commission grant the State of Louisiana a waiver that allows LWIN to operate in the 12.5 kHz channel efficiency through December 31, 2024. Such an extension would allow the first responder community the opportunity to realize the full potential of limited resources, optimize the life of existing equipment, and would foster a greater willingness of organizations within Louisiana that have been reluctant to join LWIN due to the uncertainty of its future to commit to the investments required in order to become a part of LWIN.

Finally, the State of Louisiana respectfully requests that the Commission expedite its review of the waiver request because local jurisdictions must make decisions now in their current budget cycle about future public safety communications requirements within the next three to four months. As previously mentioned, parishes within the Greater New Orleans area are considering alternatives to

having to endure the unnecessary burden of replacing subscriber units in order to comply with the Commission's narrowbanding mandate. These parishes are midway through their current fiscal year and have funding available now to begin upgrading their older 800 MHz radio systems to meet first responder's future needs if the 6.25 kHz channel efficiency deadline is left intact for Louisiana. The cost of upgrading the 800 MHz radio systems is significantly less than replacing existing subscriber units throughout the parish. Without a waiver, these parishes will have no choice but to begin to go down a road that would ultimately balkanize the largest statewide interoperable radio system in the country. An expedited review and ruling on this waiver request is necessary given the short timeframe under which local jurisdictions must act in budgeting their future public safety communications needs.

The State of Louisiana looks forward to working with the Commission on these and other important public safety issues as necessary.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Pat Santos", with a long horizontal flourish extending to the right.

Pat Santos

SIEC Chairman

ATTACHMENT A: LETTER OF SUPPORT FROM THE CITY OF NEW ORLEANS

CITY OF NEW ORLEANS

MITCHELL J. LANDRIEU
MAYOR

LtCol JERRY SNEED, USMC (RET)
DEPUTY MAYOR OF PUBLIC SAFETY

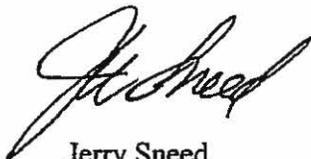
July 2, 2012

Pat Santos
Chairman
Statewide Interoperable Executive Committee
7667 Independence Blvd
Baton Rouge, LA 70806

Dear Chairman Santos,

I am writing to express support in the State's effort to obtain a waiver from the FCC rules outlined in FCC 90.535 regarding narrowbanding of the 700 MHz spectrum. This waiver is necessary to ensure the longevity of the Louisiana Wireless Information Network (LWIN) and protect the ability of first responders throughout the Greater New Orleans area to have mission critical voice communications on a shared state and local statewide radio system. As the 2017 deadline is quickly approaching local jurisdiction within the region, to include the City of New Orleans, are looking at different options that would ensure first responders within the region would continue to have the ability to utilize existing subscriber units. The most likely course of action is to upgrade or build a new system that operates strictly within the 800 MHz spectrum and thus avoid the necessity of having to replace all the subscriber units within the Region. Most of these scenarios would likely result in a radio system that would not be part of LWIN and thus reduce our ability to establish interoperability throughout the State. It must be stressed that these scenarios are only being developed as a result of the pending narrowbanding deadline. The City of New Orleans has endorsed the concept of a shared radio system and has played an integral part in the build out of LWIN. The City of New Orleans has no desire to go down a path that would ultimately reduce our ability to talk to other first responders throughout the State that may be providing services through mutual aid to the City during a disaster. The City of New Orleans urges the FCC to make a quick decision that is favorable to the State and Greater New Orleans region by approving the State's waiver request.

Respectfully,



Jerry Sneed
Deputy Mayor for Public Safety
City of New Orleans

ATTACHMENT B: LETTER OF SUPPORT FROM JEFFERSON PARISH



WWW.JEFFPARISH.NET

JOHN F. YOUNG, JR.
PARISH PRESIDENT

JEFFERSON PARISH
DEPARTMENT OF EMERGENCY MANAGEMENT

DAVID B. DYSART, CEM. IEM
DIRECTOR

July 3, 2012

Mr. Pat Santos, Chairman
Statewide Interoperable Executive Committee
7667 Independence Blvd
Baton Rouge, LA 70806

Dear Chairman Santos,

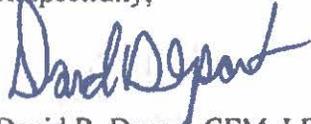
I am writing to express support for the State's effort to obtain a waiver from the FCC rules outlined in FCC 90.535 regarding narrowbanding of the 700 MHz spectrum. This waiver is necessary to ensure the longevity of the Louisiana Wireless Information Network (LWIN) and protect the ability of first responders throughout Jefferson Parish and the Greater New Orleans Region to have mission critical voice communications on a shared state and local statewide radio system. Jefferson Parish is very aware of the impact the 2017 FCC deadline will have on our Tier 1 communications and are examining all options that would be available to ensure first responder communication is not negatively impacted as a result. The greatest impact of this FCC mandate is the cost of replacing the millions of dollars' worth of recently acquired subscriber units that will not be at the end of service life by the date of proposed deadline of compliance. In fact, it would be far less expensive for the Parish to purchase and operate a system exclusively in the 800 MHz spectrum which will not be impacted by the 2017 regulation as opposed to replacing our thousands of subscriber units. This will alleviate any requirements to replace all of our existing subscriber units on hand immediately and allow for these to be replaced through the normal process of natural attrition. Although we are examining multiple options, most of these scenarios would likely result in a radio system that would not be part of LWIN and thus reduce our ability to establish interoperability throughout the State.

It must be stressed that these scenarios are only being developed as a result of the pending narrowbanding deadline. Jefferson Parish has aggressively supported the LWIN shared Radio System and our Sheriff's department is currently housing the heart of the system for Region 1. Jefferson Parish must reiterate that we have no desire to depart from the LWIN system which would ultimately reduce our ability to talk to other first responders throughout the State on an interoperable system that may be providing services through mutual aid to the Parish during a disaster. Jefferson Parish therefore urges the FCC to make a quick decision that is favorable to the State, Jefferson Parish and the Greater New Orleans region by approving the State's waiver request.

Mr. Pat Santos
July 3, 2012
Page 2

If you have any questions, please contact me at (504) 349-5360.

Respectfully,

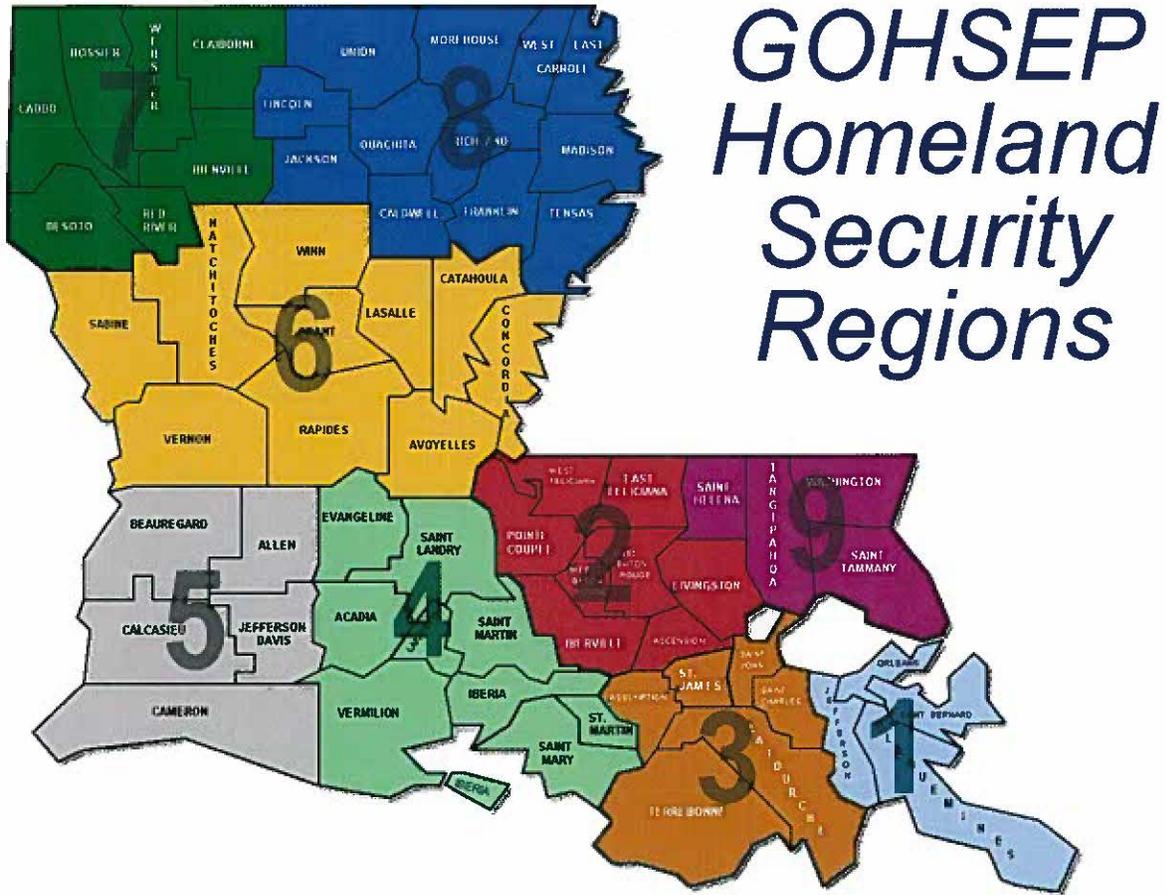
A handwritten signature in blue ink, appearing to read "David B. Dysart". The signature is fluid and cursive, with a large initial "D" and "B".

David B. Dysart, CEM, LEM
Director

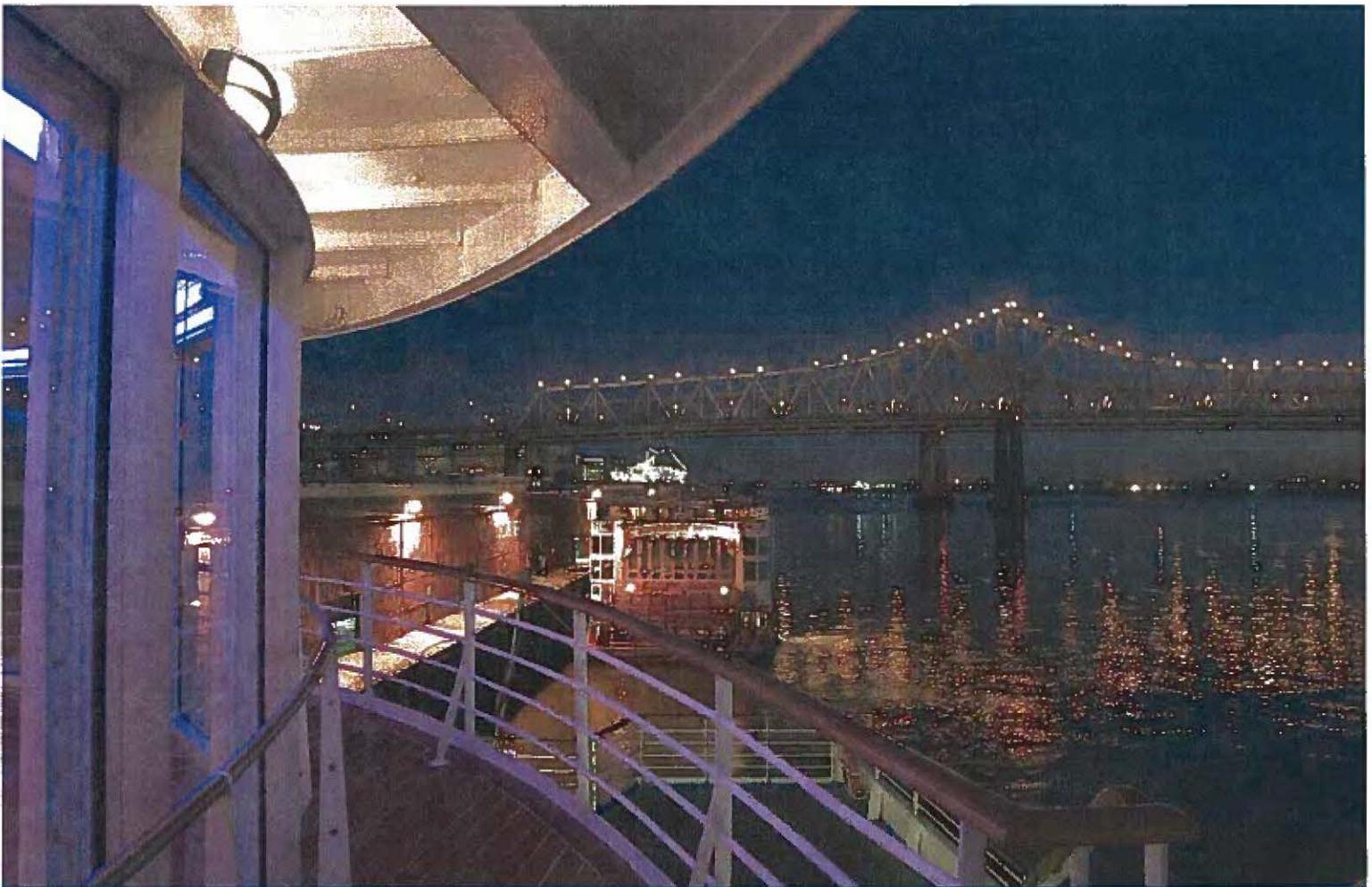
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CC: John F. Young, Jr., Parish President
R. Christopher Cox, Chief Operating Officer
Jennifer VanVrancken, Deputy Chief Operating Officer
Jerry W. Sneed, Deputy Mayor, City of New Orleans

ATTACHMENT C: STATE OF LOUISIANA HOMELAND SECURITY REGIONS



ATTACHMENT D: DHS CASE STUDY OF LWIN



Usage Case Study: Louisiana Wireless Information Network

September 2011



Homeland
Security

Usage Case Study:

Louisiana Wireless Information Network

The U.S. Department of Homeland Security's 2006 National Interoperability Baseline Survey determined that fewer than nine percent of emergency response agencies reported using real-time interoperable communications among State and local entities on a daily basis. Using interoperable systems, governance structures, and written agreements on a daily basis is a critical element in preparing jurisdictions for large-scale events. Just six years after being devastated by Hurricane Katrina, the State of Louisiana has achieved one of the most sophisticated levels of communications usage in the Nation.

Pre-Hurricane Katrina Environment

During the 1980s, Louisiana was among the first States in the country to deploy a statewide radio system for the emergency response community. This same radio system became the lifeline for emergency responders during Katrina. Although one of the main radio

towers was disabled during the storm, technicians were able to establish a new site within days following the storm. As a result, the system became the only functioning radio system available to responders in New Orleans. However, because the system was not designed for the quantity of traffic experienced during Hurricane Katrina, communications were hampered by ongoing congestion.

Post-Hurricane Katrina Environment and Daily Use

Following Hurricanes Katrina and Rita, State and local officials came together to focus on a single statewide system that all emergency response officials could use. The system was the first statewide system based on the recently released 700 MHz spectrum and replaced the existing analog system with a Motorola ASTRO25 P25-compliant digital system. Using Federal recovery funding, the system was

Usage

The Interoperability Continuum is designed to assist emergency response agencies and policy makers to plan and implement interoperability solutions for data and voice communications. This tool identifies five critical success elements that must be addressed to achieve a sophisticated interoperability solution. The fifth critical success element is capitalize usage. In order to reach the most sophisticated level of interoperability in the Usage lane, the interoperability systems used in the jurisdiction must be used every day for managing routine as well as emergency incidents. In this optimal solution, users are familiar with the operation of the system(s) and routinely work in concert with one another. Success in this lane also is contingent upon progress and interplay across the other four lanes.



Interoperability Continuum



initially designed to cover the Greater New Orleans area. However, by leveraging Federal grant funding in addition to State general funding, the State was able to build what is now the largest statewide radio system in the country. It provides daily voice communications to more than 60,000 users at the Federal, State, local, and nongovernmental levels. Of these users, more than 70 percent are from local jurisdictions.

The system, called the Louisiana Wireless Information Network (LWIN), is fully maintained by the State and charges no fees to its users. LWIN provides 95 percent in-building coverage to the nine largest metropolitan areas in the State. In 2010, there were more than 95 million push-to-talk transmissions on LWIN, which utilized more than 114,000 service hours. Out of the 95 million push-to-talk communications, less than one percent of users experienced busy signals. LWIN is currently undergoing a major capacity expansion that will eliminate virtually all busy signals, and expand the system's capacity to accommodate additional users over the next ten years. In addition, once the system's 118 sites are fully operational, users will enjoy 95 percent portable on-street radio coverage throughout the State. With such extensive coverage, responders will experience near seamless communications across Louisiana.

Governing a Multi-Jurisdictional System

In 2008, Louisiana codified the establishment of the Statewide Interoperability Executive Committee (SIEC), a 20-member governing board that provides governance over LWIN. The board includes six emergency response associations, five State agencies, and nine local representatives. Seventy-five percent of the governing board is comprised of local emergency responders. According to Mark Cooper, the Director of the Governor's Office of Homeland Security and Emergency Preparedness, "the key to being able to create the necessary trust between State and local officials was reducing the number of State agencies on the LWIN governing board. The first SIEC created for Louisiana had a 56 percent majority of members belonging to State agencies. When we had the opportunity to codify the SIEC into law, we changed the makeup of the governing body to a local majority of 75 percent. This was critical for growth and acceptance at the local level." The board also has representation from tribal governments as well as the Federal government.

"... the key to being able to create the necessary trust between state and local officials was reducing the number of state agencies on the LWIN governing board. The first SIEC created for Louisiana had a 56% majority of members belonging to State agencies. When we had the opportunity to codify the SIEC into law, we changed the makeup of the governing body to a local majority of 75%. This was critical for the growth and acceptance at the local level."

- Mark Cooper, Director, LA Governor's Office of Homeland Security and Emergency Preparedness

Performance during Hurricane Gustav

In 2008, Louisiana evacuated the entire coastline of the State during Hurricane Gustav. Nearly two million residents were evacuated, making it the largest evacuation in State history. Paramount to the success of the evacuation was streamlined coordination among all levels of government through LWIN. During the ten-day event, the Greater New Orleans area did not experience any communications outages as LWIN supported more than 1.2 million push-to-talk transmissions. Though four critical communications sites were inoperable due to flooding, the State was able to reconstitute three sites through mobile towers. A fourth site was also connected back to the master site by a Federal Emergency Management Agency (FEMA) Mobile Emergency Response Support asset. "During Hurricane Gustav, we were able to achieve, full interoperability with a multi-jurisdiction and multi-discipline response through a shared radio

"During Hurricane Gustav we were able to achieve, full interoperability with a multi-jurisdiction and multi-discipline response through a shared radio system. In addition, the system was fully stressed and operated as designed."

*- Jerry Sneed, Deputy Mayor
Public Safety for New Orleans*

system. In addition, the system was fully stressed and operated as designed,” stated Jerry Sneed, Deputy Mayor of Public Safety for New Orleans.

LWIN Response for the Gulf Oil Spill

On April 20, 2010, the Deepwater Horizon Drilling Rig exploded, resulting in a catastrophic release of oil into the Gulf of Mexico. For five months, the entire world watched as responders, engineers, and scientists struggled to contain and resolve the incident. LWIN served as the communications backbone for the U.S. Coast Guard (USCG), and State and local officials. Within 24 hours, an LWIN mobile tower was launched to Mobile, Alabama, and voice communications were established between the Area Command in Robert, Louisiana, and the two Unified Command Groups in Houma, Louisiana and Mobile, Alabama. Within 48 hours, technicians working for the Louisiana Department of Public Safety connected the statewide radio system in Mississippi and the Orange Beach Fire Department radio system in Alabama to LWIN through an IP-based bridging device, effectively establishing voice communications all the way from the Texas/Louisiana border to the Florida Panhandle for the USCG. Louisiana also issued 200 portable radios from the State’s cache to allow the USCG to immediately establish voice interoperability.

Within one week, radio systems in the Texas counties of Austin, Houston, and Harris were added to the system through a P25 Inter-RF Subsystem Interface, extending the network, now called GulfWIN, to central Texas. This rapid connection of multiple systems was possible due to the integration of the Communications Unit Leaders (COML) on staff at all levels of government. According to Brant Mitchell, the Chair of the State’s Statewide Interoperability Governing Board, “The key to being able to integrate technologies providing communications over an extensive distance was the existing relationships between the Gulf States and the existence of COMLs who facilitated the process and ensured that all involved were speaking the same language and were able to operate on the same page.” In addition, Louisiana, Mississippi, and Orange Beach granted access to individuals on all three systems, allowing users to talk along the affected area using a single radio. The system is still connected today and ready to establish interoperability for any event that affects the region.

Usage during Smaller Scale Incidents

Using interoperable communications throughout a region as a part of day-to-day operations is a key capability because it allows responders to focus on the core mission of public safety. While this may

“The key to being able to integrate technologies providing communications over an extensive distance was the existing relationships between the Gulf States and the existence of COMLs who facilitated the process and ensured that all involved were speaking the same language and were able to operate on the same page.”

*– Brant Mitchell, Chair
LA Statewide Interoperability Governing Board*

seem trivial, saving just a few minutes can greatly impact the response effort. Recently there was a multijurisdictional incident that exemplified how important interoperable communications is during smaller incidents. On the morning of May 4, 2011, a Louisiana State Trooper was fired upon and grazed in the head by a bullet during a routine traffic stop. During his struggle with the assailant, the trooper was able to call for backup using LWIN. Within minutes, West Baton Rouge Sheriff deputies arrived at the scene to assist.

“Whether the law enforcement community is faced with natural or man-made disasters, large scale events such as Mardi Gras, or a lethal encounter on the side of the road, the most critical component for a successful outcome is the ability to effectively communicate,”

*– Colonel Mike Edmonson, Louisiana State Police
Superintendent*

“In a time of crisis, when a trooper, deputy, or officer activates their portable radio, the ability to communicate can be the difference between life and death. The life of one of my troopers was recently

saved due to the heroic actions of West Baton Rouge Parish deputies who heard his call for assistance on Louisiana's shared radio system."

Conclusion

Moving forward, Louisiana will continue adding new users to LWIN. Although most of these new users will come from within the State, Louisiana will also continue building on the regional relationships established during the Deepwater Horizon oil spill. Louisiana's success stems not only from daily usage, but also from the institution of strong governance, standard operating procedures, technology systems, and training. Leveraging Louisiana's lessons learned, other States and localities can improve all-hazards response during events. Regardless of whether other States follow Louisiana's approach to usage, the incorporation of all lanes of the Continuum are vital to emergency response effectiveness.

This case study is part of the Office of Emergency Communication's (OEC) 10-Year Anniversary of 9/11 project. OEC will publish six case studies aligning to the Interoperability Continuum and detailing milestones in the areas of governance, standard operating procedures, technology, training and exercises, and usage. Each study will represent the strongest solution from a State, region, city, or town across the Nation and is geared toward the emergency response community.

ATTACHMENT E: ADMIRAL BARNETT FCC BLOG ON BP OIL RESPONSE AND INTEROPERABILITY



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Louisiana, Mississippi, And Alabama Bring First Responders Closer Together As U.S. Takes Action To Contain Gulf Oil Spill And Protect The Shoreline

May 7th, 2010 by **Jamie Barnett** - Chief, Public Safety and Homeland Security Bureau



States of Louisiana and Mississippi, as well as Orange Beach, AL, Create Seamless, Interoperable Communications from the Texas Southeast Border to Pensacola, Florida

As the crew of the MV Joe Griffin is in the Gulf of Mexico working to lower a 100-ton concrete and steel containment dome over the oil well that erupted on April 20, federal, state and local officials continue to take actions to help minimize further damage to the Gulf Coast's shorelines.

In any disaster, an effective response requires reliable, seamless and robust communications that enable all levels of government and first responders to communicate with one another and share time-sensitive information and relevant data. Information on the latest situation, the availability of resources and the capability to use those resources is critical to government's ability to continuously analyze the situation and deploy a rapid, effective and sustained response.

There are many heroes emerging from this disaster. This week we received correspondence from Benjamin Bourgoyne, Communications Section Chief for the Governor's Office of Homeland Security and Emergency Preparedness in the State of Louisiana. Mr. Bourgoyne informed the FCC and other federal partners that they, along with the State of Mississippi, and Orange Beach, Alabama, had taken the lead in creating an interoperable wireless communications network for states along the entire Gulf Coast, stretching from the Texas Southeast border to Pensacola, Florida. They were able to create this interoperable network by initiating a number of 700 MHz trunked public safety radio talk groups on the respective wireless information networks in the states of Louisiana, Mississippi and Alabama.

As Mr. Bourgoyne noted, "If this is successful, it will pave the way for permanent talk groups where specially programmed land-mobile radios could be used by first responders to effectively communicate from anywhere within the network," bringing public safety officials and agencies closer together in Texas, Louisiana, Mississippi, Alabama and Florida.

This is quite an achievement, and I would like to personally thank and commend the state and local officials who led this effort for their dedication, teamwork and quick thinking in a time of crisis. It is no small task to create such a network. It is a huge effort to ensure that it is reliable and offers public safety true interoperability for voice communications.

The success of this initiative and the willingness of these officials to work together to create this multi-state interoperable network demonstrates just how valuable interoperable communications is to public safety and why it is so critically needed in

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disasters and emergencies. It also makes me look forward to the day when a public safety broadband wireless network, one that is truly nationwide and interoperable, will eliminate the need for the Herculean effort that was required by these tremendous professionals to ensure that they could talk to each other as they respond to this disaster.

One Response to "Louisiana, Mississippi, And Alabama Bring First Responders Closer Together As U.S. Takes Action To Contain Gulf Oil Spill And Protect The Shoreline"

1. Guest says:

May 17 2010 at 10:14 AM

As a fellow amateur radio operator ~ please take note that in ANY disaster, regardless of the magnitude, communications plays the ESSENTIAL role in saving lives & property in a timely manner. KUDOS to the Governor's Office of Homeland Security & Emergency Preparedness @GOHSEP on Twitter for taking the position as a lead government agency in yet another man-made disaster. Perhaps the Federal government & @FEMA on Twitter could learn from the states INSTEAD of playing Big Brother to ALL.

Leave a Reply

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