

**COUNTY OF**



**ALLEGHENY**

**RICH FITZGERALD**  
COUNTY EXECUTIVE

November 29, 2012

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S. W.  
Washington, DC 20554

Re: Comments on Application of FiberTower Corporation to Discontinue Domestic Telecommunications Services  
WC Docket No. 12-334  
Comp. Pol. File No. 1066

Dear Secretary Dortch:

In 2009 Allegheny County Pennsylvania entered into the first of three agreements with FiberTower Corporation for the provisioning of connectivity for its public safety radio systems and site monitoring and status alarms.

These systems include emergency dispatch and field communications for over 200 fire departments, 110 police agencies and 50 EMS agencies. In addition all communications with the County Police and Sheriff as well as interoperable communications with several universities, health care facilities, Pennsylvania Emergency Management Agency, adjacent counties, the Pennsylvania State Police, Pittsburgh Office of the F. B. I., D. E. A. and Homeland Security efforts at Pittsburgh International Airport depend on this connectivity.

The decision to migrate to FiberTower from existing leased copper and T-1 circuits was made for several reasons, primarily the significant unreliability of the existing network. Whilst on their systems, areas of the County radio network were down, at times for hours on end, seriously compromising radio communications, first responders and the public.

Upon notification from FiberTower of their possible imminent cessation of services, (received on November 13, 2012), the County immediately began contacting Verizon and other vendors seeking alternate connectivity options.

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ALVIN HENDERSON JR., CHIEF

**DEPARTMENT OF EMERGENCY SERVICES**

911 COMMUNICATIONS • EMERGENCY MANAGEMENT • EMERGENCY MEDICAL SERVICES • FIRE ACADEMY • FIRE MARSHAL  
400 NORTH LEXINGTON STREET • PITTSBURGH, PA 15208  
PHONE (412) 473-2550 • FAX (412) 473-2623 • WWW.ALLEGHENYCOUNTY.US

There are several issues with the situation at present:

1. Whilst a local vendor is able to provide T-1 connectivity at a number of the tower sites (18 in total) they are, until now, unable to guarantee they have any connectivity to as many as three of these facilities as they simply do not provide any telephony service in those areas.
2. Other vendors we have contacted are only now building out their connectivity to a number of towers. Allegheny County is continuing to explore these alternatives as they become available but currently there is not a viable alternative.
3. At each site hardware is needed to migrate from FiberTower to any other form of connectivity. This is site specific and in a number of cases must be purchased, manufactured, shipped and installed all within a three week period. This timeline is impossible to meet.
4. There will be a significant financial impact both in hardware and in technical services. In addition, with the pending narrow banding mandate rapidly approaching the availability of both hardware and technicians is at a premium.

Of the forty six (46) primary radio channels, seventeen (17) would be completely down and twenty three (23) others will be compromised to the extent they will for all intents and purposes be useless. All EMS and the vast majority of fire departments in the County rely on alerting over the radio system for all dispatches. This would be virtually non-existent with this connectivity loss. As many of the fire departments are volunteer, staffing stations is entirely impractical.

Allegheny County's position is that we are unable to receive service or a reasonable substitute from another carrier AND that the public inconvenience and necessity will be otherwise adversely affected. I would offer that this is a far more serious matter than "inconvenience and necessity" as it speaks to the root of public safety emergency communications.

Whilst the County will continue to work aggressively to migrate to alternate connectivity it is also anticipating that this move will take five to six months, at a minimum, and therefore is asking that the Commission take such action as necessary to ensure that FiberTower maintains both their infrastructure and system monitoring and support for this period of time, at a minimum.

Sincerely,

Alvin Henderson Jr.  
Chief of Emergency Services