

THE GARRISON VOLUNTEER FIRE COMPANY, INC.
1616 ROUTE NINE
POST OFFICE BOX 252
GARRISON, NEW YORK 10524

June 11, 2013

The Garrison Volunteer Fire Co., Inc. (GFD) submits this letter to the Federal Communication Commission's Wireless Telecommunications Bureau and Public Safety and Homeland Security Bureaus in response to the February 11, 2013, open request for comment to inform the Bureaus in their recommendations to the Commission relating to its implementation of Section 6103 of the Middle Class Tax Relief and Job Creation Act of 2012 (Act) as it applies to the 470-512 MHz band (T-Band).

GFD is a not-for-profit fire corporation contracting with the Town of Philipstown to provide fire protection and rescue services to the citizens of a portion of that Town known as the Garrison Fire Protection District. EMS services are provided by an independent volunteer ambulance corps, and Law Enforcement is handled by the Putnam County Sheriff and the New York State Police. The latter two agencies operate on VHF High Band and currently don't allow anyone else to use their channels.

GFD is in Garrison, Putnam County, New York, in the middle of the Hudson Highlands area of the Lower Hudson Valley.

For many years we have had to deal with a Putnam County-operated low band system whose signals (among other weaknesses) get sucked out of the air by the iron and copper in the hills.

Counties above us, below us and across the Hudson River from us are moving or have moved to UHF. We and other departments in our Town (Philipstown) and across the river in the same valley (i.e. Town of Highlands) have started using our own UHF radio systems, which we are currently coordinating through informal means and which now allow us vastly improved interoperability capabilities.

Unfortunately, several of the departments (including ours) have received their licenses in the T-Band but now, as a result of the above-referenced legislation, we look forward to having to find some vacant non-T frequencies in the coming years in order to satisfy the requirements of Section 6103.

We are between 40 and 50 miles from New York City and, considering the terrain of the Hudson Highlands (part of the Appalachian chain that moves northeast to become the Berkshires) anything we put up on our hills has great potential to interfere with or be interfered with by other users in the flatter lands south and east of us.

We are already cobbling together this Lower Hudson Valley interoperability group with scant funding (accompanied, of course, by town politicians who say in public it is an important and necessary expense and then cut it out of the actual budget – delaying some

of the projects for a year or so), and have committed those dollars to purchases of portable, mobile and base station radios and equipment, so we are currently up and operating in some limited, but vital, form.

The fire departments in our Town of Philipstown include Garrison, Cold Spring, North Highlands and Continental Village.

GFD has a license in the T-Band which will be used for fireground communications and also via repeater for command and support operations.

Cold Spring and North Highlands have licenses in the T-Band used similarly.

Continental Village takes advantage of the fact they are partly in Putnam County and partly in Westchester County, so they use Westchester channels for the fireground, command and support operations.

Westchester County has established a comprehensive operation utilizing T-Band channels in a trunked system for command and support operations and UHF channels for fireground communications. This system is replacing a Low Band system that was incapable of handling all the activities in that county.

North Highlands is adjacent to Dutchess County and has many Dutchess channels programmed into their radios for use during mutual aid activities.

Dutchess County has had a superb UHF dispatch, command, support and fireground system operating for more than a decade. It replaced a Low Band system.

Across the Hudson River from us in Orange County (easily accessed via the Bear Mountain Bridge), is the Village of Highland Falls, which has its own recently installed UHF repeater, with channels used for fireground, command and support functions. Above them is the Town of Cornwall, and they too are now operating on UHF.

Orange County has recently established a UHF system, gradually changing over from their Low Band system, and the local fire departments follow that system, which is designed to allow for local department channels as well as “cross-band” connections to the Low Band system, which is still utilized by the County dispatch agency.

The United States Military Academy, an important national historic and defense facility, is in Orange County – just north of Highland Falls and south of Cornwall, and just across the river from Garrison and Cold Spring. West Point FD operates on UHF government channels and has incorporated the frequencies used by the other Lower Hudson Valley departments into their radio system.

We are all very cognizant of the fact that West Point is a potential target of terrorist activity. As in Boston, with its recent fantastic interoperable radio communications display after the Marathon bombing, we are now equipped to similarly work and communicate together in the event of such a horrible action occurring at West Point.

GFD is also in the 10-mile zone surrounding the Indian Point Nuclear Power Plant, and

we expect to be called upon for various forms of assistance in the event of an emergency at the plant.

Our alliance of fire departments is thus equipped to work very smoothly together now that they all share use of one band (UHF including T-Band) and can thus communicate easily with one another when assisting in the common activity known as “mutual aid” – since all of these departments are small and rely on one another for help at major incidents.

(It is important to note that there are very few hydrant systems in the area we call the Hudson Highlands portion of the Lower Hudson Valley, which means automatic mutual aid tanker shuttle operations for any structure fire, for example.)

While our system is up and operating as we speak, we are establishing strict policies and procedures, to insure its users are operating on the system to maximum advantage, are properly adhering to appropriate system tests, and are communicating in a manner designed to achieve maximum results. We are able to maintain communications with the County dispatch agency by means of “cross-band” radios linking UHF to the Low Band system.

We expect to be linking the individual department systems in several ways, as appropriate, but in the meantime, we are equipping all our firefighters with UHF portables that can operate on neighboring fireground channels as well as their own. Inclusion of the various government interoperability channels (i.e. UTAC, UCALL, etc.) is part of our plan.

If we are required to give up our licenses in the T-Band and search for new channels on which to operate, we start with an immediate, almost overwhelming, problem – the UHF band is very crowded and there would be little room for those of us who would be looking to relocate there and thus minimize extra costs associated with a change.

Since Dutchess and Orange Counties have licenses in the UHF band, they would not be affected in such a negative manner. Westchester is another story, of course – not unlike ourselves, as the only portion of their large system on regular UHF is the eight fireground channels. The rest is on T-Band.

We are in the New York metro area, which is why T-Band was available to us in the first place. Analysis by others of public safety spectrum bands shows that the New York metro area does not have sufficient spectrum in any band to relocate their existing T-Band operations.

There is a provision in Section 6103 for reimbursement from the auction proceeds to agencies that have to relocate, but a neither new spectrum nor commitment for specific reimbursement amounts are in the legislation. We would, as a practical matter, not expect to see much, if any, of such proposed funds.

As mentioned above, we have struggled to get the financing necessary to get where we are today and to be forced to find additional monies to pay the costs that would accompany a relocation outside of the current UHF band (inclusive of T-Band) would be

nearly impossible.

It is common knowledge that the Public Safety Broadband operation proposed for the coming decade is not yet viable to meet requirements of mission-critical voice communications, so it cannot be counted on a relocation resource, should we be forced off of the T-Band. In addition, it should be noted that Public Safety Broadband would be a ridiculously expensive project to develop in these hills. There are many, many blind spots in the existing cellular systems in the communities served by our departments, which confirms the fact that a large number of antenna sites would be necessary to properly cover the area.

Inasmuch as there is little available alternative spectrum, and there would be huge (for us) costs associated with moving to another area of the spectrum (i.e. 800 MHz), we feel that the legislation is negative and counter-productive to, among other things, interoperability – locally and regionally – and to the public interest in general. Congress should be urged to reconsider its action, returning the T-Band to its vital public-safety position.

Sincerely yours,

Peter M. von Bergen
Vice President
Garrison Volunteer Fire Co., Inc.

petervonb@aol.com
845 424-3871

Please note, information regarding the radio systems of Dutchess, Westchester, Orange and Putnam counties is available from those counties; from RadioReference.com; or from me upon request.