

INTERNATIONAL ASSOCIATION OF FIRE FIGHTERS



STATEMENT OF

**JONATHAN W. MOORE
DIRECTOR OF FIRE AND EMS OPERATIONS AND GIS
SERVICES**

BEFORE THE

**HOUSE SUBCOMMITTEE ON
COMMUNICATIONS, TECHNOLOGY AND THE
INTERNET**

ON

**ESTABLISHING A PUBLIC SAFETY BROADBAND
NETWORK**

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Thank you Chairman Boucher, Ranking Member Stearns and distinguished members of the Subcommittee. My name is Jonathan Moore and I am the Director of Fire and EMS Operations and GIS Services for the International Association of Fire Fighters (IAFF). I appreciate the opportunity to appear before you today on behalf of our General President, Harold Schaitberger, and the nearly 300,000 fire fighters and emergency medical personnel who comprise our organization.

Mr. Chairman, I testify today not only as a representative of the IAFF, but as a former fire fighter who fully understands the critical importance of effective and reliable public safety communications. Prior to my employment at the IAFF, I spent my entire adult life in the fire service, starting as a volunteer fire fighter before serving for over eight years as a professional fire fighter and paramedic in the City of Concord, New Hampshire Fire Department.

Whenever and wherever needed, IAFF members are on the front lines working tirelessly to save lives and protect the public safety. Whether responding to a local crisis such as a fire or medical emergency, or a large-scale disaster such as a hurricane or terrorist attack, the men and women of the IAFF are the first to arrive on the scene and the last to leave.

No matter the size or scope of an emergency, it is critically important to ensure that our nation's emergency responders have the ability to communicate effectively. It is from this perspective as the primary users of public safety communications technology and systems that we speak today on efforts to improve public safety communications. While Congress and the Federal Communications Commission (FCC) have recently taken important steps forward to establish a nationwide interoperable public safety broadband network, establishing such a network is only the tip of the iceberg. Much work remains to be done to improve not only interoperable communications, but basic 'operable' radio communications within individual police and fire departments.

The FCC Plan

Public safety communications technology has evolved significantly over the past sixty years, and will continue to evolve. For years, the IAFF has participated in the ongoing dialogue among members of the public safety community, telecommunications industry and elected officials about how to best utilize such technology. We believe, as does the Administration and numerous others, that broadband technology can provide public safety with the ability to quickly communicate complicated information, and potentially save lives.

The public safety broadband network envisioned by the FCC, and outlined in the National Broadband Plan, will help public safety access new tools and technology to carry out their mission. The network proposed by the FCC will help assure that public safety has adequate capacity while providing first responders with resilient, hardened and affordable coverage.

Despite claims from some in industry and others in the public safety community, we believe that the ten megahertz currently allocated to public safety, combined with roaming and priority

access on the D block and other commercial networks, will provide public safety with adequate capacity for everyday use as well as large-scale emergencies.

Furthermore, because such partnerships will be required to meet the technical and operational requirements established by the Emergency Response Interoperability Center (ERIC), which itself will be advised by public safety, we have confidence that they will meet public safety's mission critical standards.

The argument that public safety needs 20 MHz is dependent on a number of assumptions which are unlikely to occur. First and foremost, this argument presumes the participation of a majority of public safety agencies in the nationwide network, and presumes that a majority of agencies in the network will utilize the myriad of applications envisioned for such a network. This sort of buy-in is unlikely to happen for several reasons, including use of alternate networks, personal preference, and, perhaps most importantly, cost.

The argument also presumes the participation of non-public safety entities such as utilities and state governments, a controversial proposal in the public safety community as well as among public officials.

Perhaps the most important aspect of the FCC plan is the fact that it proposes both short and long-term funding mechanisms to help build and maintain the public safety network. While some may disagree about the specific manner by which a public safety broadband network should be funded, the fact that a funding mechanism must be found is not debatable. Investing proceeds from the D block auction will help fund the network's initial construction, while imposing a minimal public safety fee on broadband users will provide significant funding to operate, maintain and improve the network.

As no public safety network is viable without both short and long term funding, neither is any such network viable if it is unaffordable to its end-users. As public safety budgets nationwide face significant cuts in the current economy, affordability is key to making any network interoperable on a nationwide level. This is especially true in rural communities, many of which have poor network coverage and access. The FCC plan contains several proposals to ensure that both network access and equipment is affordable to the end-user.

First, the FCC plan calls upon the D block licensee and other 700 MHz commercial licensees to develop commercial devices that can operate across Band 14 in its entirety. Leveraging commercial technologies in this manner is expected to reduce the cost of devices to public safety. Additionally, the FCC plan calls for the utilization of the General Services Administration schedule to provide reasonable benchmark rates for public safety equipment as well as network access.

Lastly, by auctioning the D block, the FCC plan provides public safety with a true competitive choice among commercial partners, as well as the more competitive network rates which would follow.

Alternate Proposals

Because the FCC plan will provide public safety with an affordable network which meets mission critical standards, we believe it is a pragmatic solution to the problem of establishing a nationwide broadband network.

Some in industry and the public safety community have suggested that the FCC plan is insufficient to meet public safety needs, and instead, recommend reallocating the D block to public safety. While well-intentioned, we believe that this proposal is not only unnecessary, but unrealistic.

As a case in point, legislation reallocating the D block to public safety has been introduced in the House by Representative Peter King (R-NY). However, the bill provides no funding mechanism to build or maintain the network. The King bill also lacks the requirements included in the FCC plan to make equipment affordable for public safety.

Furthermore, reallocating the D block to public safety would provide a competitive advantage to the extremely limited number of carriers capable of building a nationwide broadband network across 20 MHz. By removing competitive forces, prices will rise, rendering public safety's own network potentially unaffordable for much of public safety.

The Real Problem: Basic Operability

While we support the FCC plan and the establishment of a nationwide public safety broadband network, in reality, interoperable communications on a national level is rarely going to be used. With limited exceptions, most public safety responses occur on the local or regional level. In many regions, such as the national capital area, interoperability on this level is already being addressed.

Furthermore, building a public safety broadband network will in no way address the real communications dilemma facing the majority of America's first responders: achieving basic communications operability.

Often, the communications failures of 9/11, Oklahoma City, and Katrina are cited as proof of why a nationwide interoperable communications network is needed. Yet, the failures associated with these disasters were not failures of interoperability, as is often claimed, but rather, failures of basic operability.

On 9/11, for example, it was the limited effectiveness of low-powered radios in use at the Twin Towers, combined with an extremely high volume of communications traffic that prevented fire fighters from receiving the call to evacuate. Widespread claims that a broadband network would have saved lives on that tragic day are simply not true.

Despite the promise of broadband, for the foreseeable future, communications in the fire service will continue to be dependent on radio, and ensuring fire fighters have basic radio communications capabilities must continue to be our top priority.

The safety of both fire fighters and the public depends on reliable, functional communication tools that work in the harshest and most hostile of environments. Fire fighters operate in extreme environments that are markedly different from those of any other radio users. Fire fighters operate in zero visibility, in high heat, high moisture environments and wearing self-contained breathing apparatus facepieces that distort the voice.

It is precisely this environment that makes the application of new technology so challenging. Current digital radio technology, for example, is largely unintelligible on the fireground.

Fire fighters are further challenged by bulky safety equipment - particularly gloves that eliminate the manual dexterity required to operate portable radio controls.

Firefighters operate inside structures of varying sizes and construction types. The size and construction type of the building have a direct impact on the ability of a radio wave to penetrate the structure and be interpreted by the receiver.

Any communications technology must take all of these factors into consideration in order to assure safe and effective communications on the fireground.

The IAFF has made it a priority to ensure that everyone goes home safe at the end of each shift. Because radios are one of most important pieces of safety equipment, we expect that any new communications system will be effective, safe, reliable and simple to use.

Communications technology must not only be reliable, it must also be affordable. Today, a basic handset can run into the thousands of dollars. Understandably, fire departments are reluctant to spend significant amounts on new technology that has not been thoroughly field tested. As communities nationwide continue to squeeze public safety budgets, fire departments will simply be unable to utilize new technology if it is too expensive. We can and must do better. The federal government can help local fire departments overcome this hurdle by ensuring federal grants for public safety communications may be spent on improved communications equipment and other activities needed to achieve basic communications operability.

Focusing time and resources on fixing these and other basic communications issues will have a larger impact on public safety than will the establishment of any broadband network. Moreover, failure to address the challenges of communications on the fireground will undermine the entire purpose of creating a broadband network. A network that enables a fire fighter in Los Angeles to communicate with a fire fighter in New York will serve no purpose if two FDNY fire fighters working the same incident can't talk to each other.

Conclusion

On behalf of the International Association of Fire Fighters, I appreciate the opportunity to share with you our views on efforts to establish a nationwide interoperable public safety broadband network. Although the FCC's plan to establish such a network will provide first responders with reliable and affordable broadband coverage, these efforts will address only one small component of public safety communications needs. Congress and the FCC must commit to improving all aspects of public safety communications, including the often overlooked but critically-important matter of basic communications operability.

To the extent that the IAFF can assist the Subcommittee in working towards this end I am happy to offer our expertise and pledge to work closely with you and your staffs.

Again, I'd like to thank the Subcommittee for the opportunity to testify today and am happy to answer any questions you may have.