

National Emergency Number Association  
*The Voice of 9-1-1*



STATEMENT OF THE NATIONAL EMERGENCY NUMBER ASSOCIATION (NENA)  
REGARDING PROPOSED PLAN TO ALLOCATE 30 MHZ OF CONTIGUOUS SPECTRUM  
IN THE 700 MHZ BAND FOR BROADBAND TRANSMISSION USE BY PUBLIC SAFETY

*Approved by NENA Board of Directors, August 21, 2006*

NENA believes that it is imperative for Congress and the FCC to initiate proceedings in an accelerated manner to seek public comment on the Cyren Call Communications proposal to license 30 MHz of contiguous spectrum in the 700 MHz band to a public safety trust for public safety use and for the creation and use of a national broadband network.

NENA has consistently advocated the need to migrate to a next generation (NG) 9-1-1 and emergency communications system. The NENA Technical Committee produced a Future Path Plan in 2001, began work in 2003, and is currently nearing completion on NG 9-1-1 requirements and design. Earlier this year, NENA released the *Initial Findings and Recommendations* of the 2005 Next Generation E9-1-1 Program. One of the needs for a next generation system of emergency communications identified in the NG Report is to tap “sources of information that are only readily available with a flexible, wide access, high bandwidth network.” These applications, among many others, include telematics automatic crash notification data, pictures and video from the emergency calling public to 9-1-1 Public Safety Answering Points (PSAPs), transmission of building diagrams to firefighters; monitoring of medical or environmental data from scenes of individual trauma or mass disaster; and full-motion video from field to headquarters and from emergency response vehicles to headquarters and other field responders.

The 9-1-1 system of the near and medium future is advancing well beyond 9-1-1 as we know it today. As technology advances, Public Safety Answering Points (PSAPs) must be part of a broader next generation emergency communications system capable of not only receiving 9-1-1 calls and data communications from all types of devices, but also must have the ability to seamlessly share that information with the broad emergency response community. In a next generation environment, numerous data sources will be readily available and data sharing capabilities among PSAPs and between PSAPs and other agencies and their responders in the field will be possible that do not exist today. All of this will require increased bandwidth for emergency communications.

In a December, 2005 report to Congress, the FCC concluded that emergency response providers would benefit from the development of an integrated, interoperable nationwide network capable of delivering broadband services throughout the country, and further concluded that there may now be a place for commercial providers to assist public safety in securing and protecting the homeland. Congress has recognized the immediate need for spectrum for public safety communications and has allocated 24 MHz of spectrum in the 700 MHz band that will soon be available for interoperable public safety communications. This is vitally important spectrum for public safety, but as has been consistently pointed out by major public safety organizations, there remains a shortfall in spectrum available for broadband communications that will enable the types of data sharing we envision.

In April of this year, Cyren Call Communications, Inc. filed a petition for rulemaking at the FCC which would provide for a Public Safety Trust of radio spectrum for a nationwide, seamless, next-generation broadband network capable of integrating voice, data, and video for public safety using 30 MHz of spectrum currently scheduled to be auctioned by the FCC.

NENA appreciates the innovative approach and the significant potential benefits to the public safety community of this plan. We also appreciate the timing of this proposal. Our nation has a one-time opportunity to take advantage of the clearance of a nationwide block of 30 MHz of frequencies in the 700 MHz spectrum band. These frequencies are adjacent to spectrum currently occupied by public safety or allocated for use by public safety and would provide additional spectrum and capacity for a next-generation broadband network because of its one-of-a-kind physical properties. We will lose a tremendous opportunity to improve public safety through improved interoperability if a debate is not initiated to license this spectrum to public safety for a nationwide broadband network before this spectrum is auctioned off and lost forever. The spectrum offers perhaps the last meaningful chance for creating a fully interoperable, advanced public safety emergency communications system capable of using broadband and wideband technologies linking each and every local, state, and federal emergency response entity.

NENA wishes to make clear that having such a public discussion should not in any way delay the ongoing deployment of interoperable systems in the 24 MHz of spectrum already allocated for public safety. Nor should such a plan affect the funding that has been allocated by Congress for interoperability and PSAP grants provided in the Deficit Reduction Act of 2005. To that end, NENA is aware that plans are being developed to ensure that revenue the U.S. Treasury is expecting from auction proceeds from the 30 MHz of spectrum in question can be raised in the private capital markets and be deposited in the Treasury along with the auction proceeds from the remaining spectrum being auctioned on or before January 28, 2008. If such a plan is viable, it appears that the fiscal benefits of commercial auction of the 30 MHz would be replicated.

NENA strongly supports immediate public discussion of the allocation of 30 MHz of contiguous spectrum in the 700 MHz spectrum band to be held in trust for public safety to create a nationwide public safety broadband network. There are certainly technical, operational and policy details in such a plan that will need to be worked out among all relevant parties. However, without an opportunity to publicly discuss the merits and details of the proposal we will never have a chance to realize the gains we believe will come from such a plan. The 9-1-1 and emergency communications system in America must advance beyond its current limitations and take advantage of new technology. It is critical that Congress and the Federal Communications Commission (FCC) explore all possible options that will promote advanced interoperable voice, data and emergency communications.

Therefore, NENA requests that Congress and the FCC initiate proceedings in an accelerated manner to seek public comment on the Cyren Call Communications proposal to license this spectrum to a public safety trust for public safety use and for the creation and use of a national broadband network, beginning such proceedings immediately in the interest of public safety and our nation's homeland security.

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