

DEPARTMENT OF COMMERCE

National Telecommunications and Information Administration

Docket No: 120928505-2505-01

RIN: 0660-XC002

Development of the Nationwide Interoperable Public Safety Broadband Network

Comments from the Ohio Statewide Interoperability Executive Committee's Sub-Committee on the Nationwide Public Safety Broadband Network.

Friday, November 9, 2012

Introduction

Ohio's Statewide Interoperability Executive Committee (hereinafter SIEC), established Executive Order # 2012-07K, serves as Ohio's point of contact for all matters related to wireless public safety operability and interoperability issues. Ohio's SIEC has been in existence since October 2002 and has a well-established and recognized governance structure, represented by stakeholders from state, regional, county and local first response agencies, as well as non-governmental entities and other interested parties. In 2010, in recognition of the developing national strategy to develop a nationwide public safety broadband data network, the SIEC established a wireless broadband data subcommittee to ensure Ohio's readiness for the initiative.

Ohio's Nationwide Public Safety Broadband Network sub-committee (hereinafter NPSBNSC) submits the following comments.

Network Architecture

Stakeholders nationwide have provided significance and well-stated comments in response to the request for review of the proposed conceptual network architecture as presented by the FirstNet Board of Directors on September 25, 2012. The concept of specifying and requiring multiband communications devices is critical to the success of the initiative in Ohio, as no one cellular carrier is omnipresent.

Additionally, the state of Ohio and many local governmental agencies have significant capital invested in communications towers and on-ground hardened infrastructure; these assets must be included in any logical model due to their presence and availability. Additionally, much of this infrastructure is located in rural areas where there should not be any anticipation of commercial carrier build out due to lack of revenue generation.

The concept of prioritization for public safety users is critical to the success and acceptance of the nationwide platform; and is directly tied linked to the inevitable user fees – ruthless preemption and affordable fees will generate subscribers, the opposite will suppress subscribers and ultimately defeat the intended purpose of the initiative – ubiquitous broadband service dedicated to public safety first responders.

FirstNet Consultation with Stakeholders

To be successful in the initiative, FirstNet **must** include ongoing and realistic interaction with state, regional and local stakeholders, in the planning, developing, piloting and ultimate roll-out of the platform.

Ohio serves as a micro chasm of the entire nation – from large metropolitan areas with some public safety first responders already enjoying broadband backhaul and in-car technologies leveraging the service, to small rural agencies where dial-up internet service is non-existent. Ohio's SIEC is well established and maintains ongoing interaction with all representative agencies statewide and can provide FirstNet and immediate and ongoing sounding board for ongoing development. Do not hesitate to reach out to Ohio for the vetting of concepts, piloting of the technology, and broad-based customer feedback.

Envisioned applications

The possibilities for end-user applications once affordable, ubiquitous wireless broadband is available to our first responders appear endless. Just as our previous generation of public safety administrators could not appreciate or envision the benefit of the first generation “desktop computers”, applications not yet thought of will surface as the wireless platform becomes available. Much development work is being conducted in the application arena and Ohio believes this development will continue and accelerate. Ohio's NPSBNSC is in the process of conducting a survey to objectively determine the current state wireless applications for our public safety forces, and will invite the participants to include their future application desires.

Sharing of Resources

As previously stated, no one commercial carrier in Ohio can meet the infrastructure needs of the proposed network. The First Net Board must direct interested commercial carriers to openly and continuously interact with governmental representatives at the state, regional, county and local level in order to determine coverage and capacity needs as well as leverage the existing governmental assets available. In Ohio, the logical point of contact is our existing SIEC and NPSBNSC. Several of the commercial carriers in Ohio already routinely network with our committee and sub-committee, this practice should be strongly encouraged or required both in Ohio and nationally by First Net.

Pricing Models

One of the keys to the success or failure of the First Net initiative is the pricing model implemented with the technology roll out. What is reasonable and affordable in metropolitan areas may be a complete non-starter for agencies in rural, less populated areas. As an example, many volunteer fire services in Ohio cannot afford to pay modest user fees for a modern push-to-talk radio service, leading to the likelihood of their rejection of a fee-based broadband data service.

Ohio has considerable experience in per-unit-subscriber pricing for public safety communications platforms and stands ready to interact with First Net as you struggle with a pricing model allowing the technology to be successful. The subscriber unit pricing decisions may be the most difficult hurdle to the success or failure of the project.

Willingness of Ohio to Partner

As previously stated, Ohio has a well-established, collegially-based governance model in place; we have historically dealt with many of the concepts and hurdles now faced by the First Net Board. Ohio's first responders are ready to begin more detailed development of our portion of the Nationwide Public Safety Broadband Network initiative, we are ready to serve as equal partners with FirstNet.

Summary and Conclusion

The collective public safety first responders of Ohio, well represented by our SIEC and NPSBNSC, stand ready and able to interact continuously and positively with FirstNet as the nationwide system is designed, tested and implemented. Please accept this offer from to actively partner as the FirstNet Nationwide Network develops.

Submitted by:

Ohio SIEC/Nationwide Public Safety Broadband Sub-Committee

Point of Contact:

Darryl L. Anderson
Ohio Statewide Interoperability Coordinator
Chairman, NPSBNSC
Administrator, Ohio SWIC
darryl.anderson@ohio.gov
614-466-2257