Before the
NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION

Notice of Inquiry	**)**	
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Development of the Nationwide	**)**	**Docket No. 120928505-2505-01**
Interoperable Public Safety	**)**	
Broadband Network	**)**	

Response of City of Springfield

On September 28, 2012, the National Telecommunications and Information Administration, U.S. Department of Commerce ("NTIA"), issued a Notice of Inquiry (the "NOI"), on behalf of the First Responder Network Authority ("FirstNet") in order to (a) to seek comments on the conceptual network architecture presentation made at the FirstNet Board of Directors' meeting of September 25, 2012, (b) to invite input on other network design and business plan considerations, and (c) to seek comments on the general concept of how to develop applications for public safety users as discussed at the FirstNet Board meeting. The NOI indicates that FirstNet intends to use the input received from this process to shape its efforts to establish the interoperable public safety broadband network based on single, nationwide network architecture.

These comments are filed on behalf of the City of Springfield, Oregon. Springfield is the ninth largest city in the State of Oregon, with a population of 59,403, according to the 2010 Census. It is located at the southern end of the Willamette Valley, about 100 miles south of the City of Portland and immediately to the east of the City of Eugene, with which we share a boundary. With Eugene, we are the southernmost major city in Oregon on the heavily travelled I-5 corridor, which is the primary route serving most industrial and commercial development in

the state, and a major route for telecommunications facilities for the entire West Coast. The City is bounded by two rivers, the Willamette on the south, and the McKenzie, on the north. In this location, the City has historically been subject to significant flooding events, which, though alleviated by the construction of several flood control dams on each of the rivers, continue to be a peril.

Springfield is the Oregon home of several major high tech industries, including Symantec, which employs over 1,100 people in Springfield. It is also the home of the largest regional medical facility between Portland and Sacramento, Peace Health's Sacred Heart Medical Center at River Bend campus, a 333-bed facility with about 2,200 employees, and with an associated cardiovascular institute. Fortifying its place as a major regional health care center, Springfield is also the home to McKenzie-Willamette Hospital, and to numerous ancillary medical clinics and service facilities adjacent to the two hospitals. All of the facilities are highly dependent on access to advanced levels of broadband communication.

Although the campus of the University of Oregon is located in adjoining Eugene, Springfield is the residence of choice for a substantial number of University students. The University is frequently cited is one of the most "wired" universities in the nation and, as a result, its students are heavy consumers of a wide range of broadband services and its faculty and researchers are further interconnected with the medical facilities/community described above.

The City believes that the proposal presented to the FirstNet Board of directors is deficient in one critical respect: it fails to acknowledge the full spectrum of first responders who are vital to successfully addressing an emergency.

One of the greatest concerns of the citizen is the ability of his governmental agencies to respond to protect his safety and health in the event of a calamity. Whether it is a natural disaster – flood, fire, earthquake, or the like, or a human induce disaster – terrorism or other forms of violence.

The traditional definition applied to first responders is drawn from what are typically described as the emergency services, law enforcement and fire suppression and rescue. Regardless of whether the disaster or emergency situation is man-made or natural, a typical response from any municipality is likely to include public safety first responders and Public Works personnel. Most emergency situations of significance require the temporary closing of streets, re-routing of traffic, or assessment and repair of infrastructure, and this work requires that public works staff work in close communications with police and fire personnel. Sometimes public safety personnel cannot even reach the scene of an emergent situation until Public works staff make the approach passable.

Recent weather events confirm that reliance on Public Works personnel as first responders is not a phenomenon unique to Oregon. Despite this reality, interoperability between Public Works responders and law enforcement and fire responders is not supported by most efforts to design and implement first responder programs. Communication is an area of critical need. For example, in Springfield the only way we have been able to maintain some vestige of interoperability is by the Police Departments transfer of its obsolete hand held radios to Public Works personnel. Given the age of that equipment, it is not surprising the much of it has limited functionality, leaving staff with only the alternative of cellular phones communication, which is

clearly an inadequate approach. Unfortunately, the resources to improve the Public Works communication capacity are not there. As the American Public Works Association has repeatedly noted, in its annual report card on the state of public infrastructure, most local agencies are unable even to fund adequate maintenance and preservation of civil infrastructure. In reality, the priority of keeping that infrastructure functional under normal conditions drains away any resources which might be used to improve communications capacity. Because of the close working relationship with police and fire during emergencies, public works departments ought to be considered 'first responders' and the need to effectively communicate with these agencies should be a critical element of any FirstNet architecture as should the need to develop funding opportunities for this critical aspect of the first responder community, which is currently ignored by existing funding streams.

Thanks you for the opportunity to comment.

November 2, 2012

Respectfully submitted,

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