



## FCC INTERGOVERNMENTAL ADVISORY COMMITTEE

September 18, 2009

Honorable Julius Genachowski  
OFFICE OF THE CHAIRMAN  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

### Comments and Recommendations of the FCC Intergovernmental Advisory Committee

- 1) Emergency Communications Interoperability Spectrum
- 2) CMAS Alert Reporting Statistics
- 3) CMAS Message Alert Character Limit
- 4) System of Systems Approach to Interoperability

Dear Chairman:

The Intergovernmental Advisory Committee (IAC) was appointed by the FCC to provide feedback on various issues coming before the FCC. In that capacity, the members of the IAC have met monthly by teleconference and in person on a quarterly basis to discuss a variety of issues. The following comments are a distillation of some of the discussions and some of the recommendations of the committee.

**1) The FCC should work with the Department of Defense along with other federal agencies and the NTIA to ease any restrictions and encourage additional sharing of spectrum with public safety agencies.** Access to unused spectrum for public safety is in the public's best interest because it would significantly improve the ability of emergency response agencies regionally and state-wide to build out systems that would allow for interoperability and improved coverage. This critical unused resource called spectrum not go to waste. As an example limited available frequencies in the VHF band (proven to be the most likely solution for rural counties, regions and states) create great difficulties in the design of a substantial system. The additional spectrum will allow counties, regions and states to utilize the characteristics of the VHF band for the most efficient use of tax-payer dollars while delivering expanded and improved coverage. This increased communications ability, providing a platform for interoperability in rural America will have the potential to save lives and protect property.

**2). FCC should evaluate whether to require commercial mobile service providers to report back on Commercial Mobile Alert Service alert delivery.** Carriers should also provide reporting of message delivery, at minimum, down to the cell tower level. This information would provide emergency managers and other officials authorized to initiate an emergency alert with the capability to have some estimate of the reach of an alert within the threatened population as well as the number of people in close enough proximity to actually be threatened, thereby improving emergency response. This would also allow for Federal authorities charged to reach a certain percent of the population in case of an emergency with more accurate estimates.

**3) FCC should evaluate the current CMAS text service profile and consider whether additional information about a hazard beyond the current mandated limit of 90-characters would be beneficial..**

We urge the FCC to evaluate the current Commercial Mobile Alert Service (CMAS) text service profile with additional information about an alert/hazard beyond the current mandated limit of 90 characters. It is important to include

- Event Type or Category
- Area Affected
- Recommended Action
- Expiration Time (with time zone)
- Sending Agency

Not all of the vital warning information may be capable of being conveyed within 90 characters in some cases. For example, AMBER Alerts require more descriptive information about the incident, the child, the abductor, and possible vehicle information for the abductor. Providing the option for additional characters beyond 90 may allow for more specific guidance and likely result in a more effective public response to alerts and warnings thereby providing emergency responders with a more effective response to an incident. In the event of a severe emergency (natural disaster, terrorist attack, bio-hazard emergency, etc.) the public has only minutes or seconds to respond. Providing the citizen with as much information as possible upon the initial alert/message may be critical to preventing loss of life and property.

**4. The FCC should recognize the system of systems approach as an alternative to support interoperability.**

The system of systems approach allows separate emergency response agencies to join together using interface standards, compatible procedures, and training exercises without having to discard major investments in their existing systems. Using a system of systems approach, emergency responders will be able to connect independently operating systems and improve response for day-to-day operations, planned events, and major incidents. A

Honorable Julius Genachowski

October 19, 2009

Page 3

more realistic way to achieve interoperability may be to tie existing systems together while moving towards improved integration which is the system of systems approach.

Sincerely,

A handwritten signature in blue ink, reading "Haley Barbour". The signature is written in a cursive style with a long horizontal line extending to the right.

Haley Barbour  
Chairman