



Guy W Clinch
Director of Solutions
Public Service Markets
10 Edge Street
Ipswich, MA 01938
781.472.6055 voice/fax/mobile
gclinch@avaya.com

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FCC Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear Chairperson Victory and Distinguished Panel Members:

Avaya is grateful for the opportunity afforded our company to address your panel during the session held on Monday, March 6, 2006. I gave Avaya's perspective on a number of topics, but in light of the robust discussion that followed the testimony of the other witnesses on my panel, I am writing to reemphasize one of the points I made.

The topic is interoperability between disparate public safety radio systems: The ongoing dialogue seems to overlook solutions that can solve the problem today. This letter is to encourage you to consider viable, available, life-saving alternative solutions and to take appropriate action to make sure that these solutions are thoroughly considered and evaluated.

As has been discussed, the most critical learning from Hurricane Katrina was that communications are a matter of life and death, and that this is especially true with regard to the ability of first responders to communicate with one another. There is a crucial need to address the interoperability problem that exists between disparate public safety communications systems.

The discussion during the panel I participated in illustrates the solutions and issues that have been the focus until now:

- ↪ Timelines for the evolution of proprietary systems to a common technical plane;
- ↪ Spectrum that has been set aside for public safety yet that remains largely unused;
- ↪ The need for more spectrum; and
- ↪ The ongoing challenges, both fiscal and technological, that will exist even when this spectrum becomes available, beyond the political choices yet to be made to achieve interoperability.

While the debate on interoperability has been around since the early 1990s, technology has, in fact, overtaken the issue. We are in a position to begin a serious and prompt discussion of the solutions that have evolved based on interoperability gateways and mobility capabilities that allow callers to port full telephony applications to a variety of end points and environments.

For example, one response to Hurricane Katrina demonstrated an existing solution to the problem of interoperability. The volunteers from Anne Arundel County, MD, worked in the New Orleans suburb of Jefferson Parish in the weeks after Hurricane Katrina. Using existing technologies to extend local radio coverage to UHF, VHF, marine, aviation, 700 MHz, 800 MHz, amateur radio frequencies and satellite uplink for high-speed connections to the Internet and private networks, Anne Arundel County volunteers participated as a part of Operation Lifeline.

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In an RV-sized van, this gateway equipment provided real-time communications that enabled commanders to talk directly with and track the progress of teams in the field. Value-added features were also facilitated, such as daily videoconferences with County authorities back home, hosting of conference calls and providing of Internet hotspots.ⁱ

Steve Morgan, senior program manager with Arinc Inc., the Maryland-based company that designed the unit and integrated the technology, explained: “We could activate a conference that would put all three of them [Emergency Medical Technicians on 800-MHz radios, Dispatchers on VHF low-band radios and National Guard troops on their VHF high-band radios] in one large talk group,” he said. “The EMT could talk directly to situation managers as well as the National Guard security patrol, while they were all on different radio systems.”ⁱⁱ

Several companies manufacture solutions that contributed to this interoperability: Avaya works with these companies as part of our Public Safety Ecosystem – a set of solutions, based on non-proprietary industry standards that are provided by Avaya and our certified channel of third-party manufacturers who have integrated with our solutions.

After interoperability is achieved Avaya provides the additional capabilities such as the ability to integrate Public Switched Telephone Network technologies into the interoperable environment, and the ability for public safety officials when traveling to dial through to their communications equipment back home using a traditional telephone, a cell phone or a Voice over IP device.

So the good news is that we can move beyond the interoperability debate to a discussion of how existing technologies and solutions can solve the near-term communications problems facing first responders. Avaya believes the tools are there today and strongly encourages the committee to thoroughly investigate those solutions as part of this review. We would be happy to discuss this further if you wish more detail.

Sincerely,



Guy W Clinch
Director of Solutions

ⁱ <http://www.twistpair.com/page.php?page=wavestories&storyid=75>

ⁱⁱ http://www.washingtontechnology.com/news/20_19/emerging-tech/27037-1.html