

**Interoperability Subcommittee Final Recommendations
Regarding SIEC Name, Structure and Expanded Authority;
Channel Nomenclature Standardization for All-Band
Interoperability; Standardization of Interoperability
Restriction Footnotes in FCC Tables of Allocation;
Requirement for Statewide All-Band Interoperability Plans.
DRAFT**

The following recommendations are provided in language similar to that which the I/O Subcommittee believes the FCC could use in presenting these proposed Rule change recommendations in a Public Notice.

SIEC Name, Structure and Expanded Authority

In the 4th Report and Order on Docket 96-86, the Commission recognized that the states were the appropriate place to administer the interoperability channels. We highlight the word administer because there are emerging examples where state governments are using their SIEC to control the interoperability channels. Additionally, some states have expanded the role of their SIECs to include other state-level functions such as procurement. We believe certain changes and clarifications need to be added to the existing FCC rules concerning the SIEC's to ensure that their primary role, as envisioned by the NCC, is met. *First, we recommend that the name State Interoperability Executive Committee be changed to Statewide Interoperability Executive Committee to be more inclusive of all agencies in the state.* Second, the rules need to clearly define the role of the state within the SIEC as one of coordination and management, rather than control of the interoperability channels. Finally, the Rules need to require that the SIEC's, or RPC's where no SIEC is formed within a particular state, be inclusive of representatives from all public safety disciplines at all levels of government, should they desire to participate, and that meetings must be open to any public safety representative who desires to attend.

Background

As the Commission provided States with the opportunity to notify the Commission of each state's intent to initiate State Interoperability Executive Committee's at the recommendation of the National Coordination Committee in 1999 in the Third RO&O, some states elected not to develop and promote such a body to be empowered to facilitate the designated 700 MHz interoperability channels within that state.

Of the states that did not notify the Commission of their intent to initiate a SIEC, many had existing committees that the state felt would be appropriate to accept the

responsibility of facilitating the 700 MHz implementation and coordination. In addition, other states simply did not respond to the Commission's request for notification of acceptance of the responsibility to form an SIEC, thus allowing this responsibility to default to the Regional Planning Committee(s) in those states.

Since the Commission provided no guidelines for promoting inclusion of county/parish and local agency participation within SIEC membership, some existing state committees were assigned the SIEC role without an appropriately broad range of public safety agency members. The potential of little or no input to statewide interoperability solutions from county/parish/local agencies in the various public safety disciplines throughout a state causes great concern and can potentially yield policies that are not reflective of the concerns of all public safety entities within a state.

As the Commission feels strongly that interoperability must be inclusive of the *entire* public safety community, we are requiring the following:

RPCs who have assumed the role of the SIEC where no such committee has been designated for that region shall form an SIEC Subcommittee. All SIECs and all RPC SIEC Subcommittees shall examine their membership to ensure that it is representative of all public safety disciplines and all levels of government (local, county/parish, state, tribal and federal.) Within the remainder of this document, the term SIEC shall refer to a formal SIEC or RPC SIEC Subcommittee interchangeably. Requirements delineated herein apply equally to both.

SIEC All Band State Interoperability Plans: development, retention and availability

Years ago, the FCC required in its rules that state level plans be developed for certain inter-service interoperability channels (e.g., 155.475 MHz, the “National Law Enforcement Emergency Channel”). Unfortunately, over the years, neither the individual states nor the Commission, where most of the plans were filed, have maintained most of these “state plans”. Even if maintained, there has been no mechanism for nearby or adjacent states to view a “state plan”, nor is there a requirement for states to retain an updated, current plan on file for viewing by agencies requiring information on interoperability. For the most part, these plans have not been updated or modified to reflect more recent public safety communications interoperability needs and, as a result, these channels are currently used in a manner that fails to maximize their potential at all levels of government. The current practice of states retaining these plans has proven not to be effective in providing guidelines for the effective use of interoperability resources in communities across the country. A mechanism to retain these plans, such as a repository allowing agencies within a state, neighboring states and federal users to access a current version of the plan, is required. The National Public Safety Telecommunications Council (NPSTC) CAPRAD database is an example of a tool that can retain these plans.

Thus, the Commission is requiring each state’s SIEC to provide to the Commission or its designee an updated version of its state Interoperability Plan every three

years. This plan shall provide detailed information on public safety communications interoperability useful to agencies within their state, local agencies in bordering states, and with tribal/federal users regarding all FCC designated interoperability channels. Example templates for such plans are provided by the NCC's Implementation Subcommittee Regional Planning Committee Guidelines.

Adopting NCC channel nomenclature and display

In addition, we adopt the recommendations of the National Coordination Committee on issues surrounding standardized channel nomenclature and expansion of the SIECs to include all public safety bands. Current FCC-designated interoperability and intersystem channels suffer from a nationwide lack of cohesiveness and coordination that inhibits the implementation of, and fails to promote, consistent public safety interoperability within communities across the nation.

This issue is consistent with the FLEWUG petition now pending before the Commission recommending centralized interoperability in states and a consistent nationwide implementation of interoperability channels. Parameters established for Part 90 interoperability channels by SIEC's appear to be applicable to NTIA Red Book Interoperability channels that may be available by 2005. The Commission recommends that any use by Part 90 eligibles of these channels pursuant to Federal agency agreements should follow these same interoperability guidelines.

Clearly, a fresh look at all interoperable spectrum as a single, unique public safety band (resource) that can offer tremendous benefits to the first responders community is needed to promote effective use of these public safety resources.

Furthermore, during the transition to the Commissions Universal Licensing Service (ULS), records of many specific channel license conditions, (ex. Limitation 19 inter-system sharing) that were in many areas *the building blocks of locally developed unique interoperability conditions* in a given area, were lost. In many cases, the regionally developed and accepted discipline specific qualities of these channels, which were in many cases coordinated by states, were not recognized by neighboring states and led to reduced public safety communications interoperability within the region. This caused interference to first responders using these channels to solve interoperable solutions in their community.

An example of ULS not offering the criteria of regional use for certain inter-system sharing channels would be the licensing of a frequency to one discipline, in a community where another discipline of public safety users has for years established long term, multi-agency interoperable conditions on the same channel. The standardization of technical parameters for all interoperability/inter-system sharing channels and the commissions re-emphasis on the nature of channel usage in a particular region is needed to rectify problems that may arise in the public safety community.

The mandatory development of regional/state plans for all interoperability/inter-system sharing channels by a Statewide Interoperability Executive Committee is crucial to successful interoperability implementation between users. The plans will document technical and operational parameters within a state/region for all interoperability channels and the availability of these plans to users in adjacent states and regions is necessary to maintain interoperability. Keeping interoperability parameters (operational and technical) a secret from other public safety agencies benefits no one.

It is the unanimous opinion of the Interoperability Subcommittee that these resolutions will address two of the greatest impediments to effective public safety interoperability. Furthermore, these issues are consistent with the FLEWUG petition now pending before the Commission which states that there be must be minimal standardization of interoperability for public safety communications to be effective nationwide.

Recommendations:

The use of mandatory, nationwide all-band interoperable channel nomenclature and associated display characteristics. This finalized list is provided in I/O Subcommittee document IO-0107D-20030716 and is based upon recommendations approved by the NCC Steering Committee in response to recommendations presented in IO-0106A-20021121..

The Missouri SIEC Template is provided as an example of a template of Minimum Interoperability Guidelines for States to use as a starting template for state All Band Interoperability plans. This document is part of I/O Subcommittee document IO-0109A-20030201.

Standardized operational and technical standards intended to promote seamless interoperability throughout all bands, nationwide were addressed in the letters provided to NCC Chairman Wallman by the I/O subcommittee at its last two meetings. Reference IO-0106A-20021121 and IO-0115A-20030221.

Mandatory SIEC creation in each state, expanded authority and SIEC renaming

The establishment of FCC Required, all band interoperability plans authored by the SIEC's along with the requirement they be retained online on a database (such as CAPRAD) and updated every three years in PDF form for viewing by agencies within the state, adjacent state public safety users along federal responders..