

COMMENT BY A MEMBER OF THE PUBLIC

From Kimberly B Cheney

On the 10 year Telecommunications plan.

The Department of Public Service has concluded that Land Mobile Radio (LMR) is not included in the term "telecommunications" and therefore planning for public safety LMR need not be included in the 10 year Telecommunications plan mandated by 30 VSA §202d. I find no explicit statutory definition to support this position. Indeed the contrary is easily demonstrated. LMR is the primary means of communication among public safety professional first responders and 911 responders. It is indisputably a telecommunications technology. The Department's position is plainly wrong.

LMR has been recognized a vital part of telecommunications by the Dept of Homeland Security in this presentation regarding Project 25.:

Project 25 (P25) is a standards development process for the design, manufacture, and evaluation of interoperable digital two-way land mobile radio systems communications products created by and for public safety professionals. The P25 standard is a critical component to achieve interoperability among different suppliers' products. The P25 CAP provides responders with the confidence that the communications equipment they use has been tested against the standards and successfully tested for interoperability, no matter the manufacturer. The P25 CAP is a congressionally mandated program that has enjoyed continued congressional support through DHS appropriation Conference Reports. As a voluntary program, P25 CAP allows suppliers to publicly attest to their products' compliance through P25 CAP testing at DHS-recognized laboratories. As proof, suppliers are required to submit Summary Test Report (STR) and Supplier's Declaration of Compliance (SDOC) documents. In turn, P25 CAP makes these documents available to the first response community to inform their purchasing decisions via the [S&T's P25 CAP website](#).

Further Home land Security description of Project 25 Includes the following:

Formed in 1990 in accordance with an agreement between the Association of Public-Safety Communications Officials (APCO), the National Association of State Technology Directors (NASTD), and agencies of the U.S. federal government, Project 25 (P25) is a unique user-driven process that works with equipment manufacturers to establish current and emerging wireless land

mobile radio (LMR) communications standards that meet the requirements of the public safety community. Project 25 is the only known user-driven emergency communications standards process in the U.S. The Department of Homeland Security Science and Technology Directorate leads the congressionally legislated P25 Compliance Assessment Program and supports SAFECOM recommendations related to emergency communication standards development.

Indeed an entire week has been set aside to support this process as the Chief of the Bureau of Public Safety states:

April 13, 2021

By [Lisa M. Fowlkes](#) | Chief, Public Safety and Homeland Security Bureau

It's National Public Safety Telecommunicators Week, when we honor the dedicated professionals who answer the public's calls for help and dispatch life-saving assistance.

This past year was especially challenging for the public safety community. As the pandemic raged, the volume of 911 calls reached record levels in some locations. Telecommunicators, most of whom continued to work on-site, developed protocols to screen 911 callers for COVID-19 symptoms in order to better prepare first responders. Some areas were also hit with natural disasters, from tropical storms and wildfires to hurricanes and severe winter weather. Throughout these difficult times, telecommunicators were there to assist us – often while coping with these same challenges in their personal lives.

To these invaluable 911 professionals: we are grateful for your service.

The FCC continues to work on ways to support telecommunicators and other 911 professionals as you carry out your important missions. Later this month, for example, the Commission is tentatively scheduled to vote on a [proposal](#) to promote public safety by ensuring that 911 call centers and consumers receive timely and useful information about network disruptions that affect 911 service. If the Commission votes to move forward, we will seek public comment on these potential new rules.

I also want to highlight the FCC's [Public Safety Support Center](#), a web portal where Public Safety Answering Points can report problems related to 911 service, including outages, fraudulent or spoofed 911 calls, missing or inaccurate location information with a 911 call, text-to-911 service problems, and carrier lines of demarcation issues. You can also provide updates to the FCC's Master PSAP Registry and submit questions about the FCC's rules and other 911 topics. Here's a [tip sheet](#) about the Public Safety Support Center that may be useful to you. Our team will respond promptly to any inquiries.

Of course as always, our FCC Operations Center is available 24 hour a day, every day, to assist you with urgent matters. Just call us at (202) 418-1122.

Thank you again for helping to keep the public safe.

30 VSA §202 c (7) regarding State Telecommunications policy and planning supports this interpretation of the statutes. That law provides planning must:

Support the application of telecommunications technology to maintain and improve governmental and public services, public safety, and the economic development of the State.

LMR is likewise clearly included in 30 VSA 202d (8) which provides:

(8) With respect to emergency communications, an analysis of all federal initiatives and requirements, including the Department of Commerce FirstNet initiative and the Department of Homeland Security Statewide Communication Interoperability Plan, and how these activities can best be integrated with strategies to advance the State's interest in achieving ubiquitous deployment of mobile telecommunications and broadband services within Vermont.

This provision mandates consideration of HomeLand Security interoperability planning to achieve UBIQUITOUS (emphasis added) deployment of mobile telecommunications. Only consideration of LMR could lead to a ubiquitous planning process for telecommunications

The department's reading of its responsibility under these statutes is too narrow, and reflects a choice by the Public Service Dept to defer to Public Safety prominence in LMR rather than explicit statutory language. This appears to be an administrative decision convenient for governmental comity but contrary to statutory mandate.

I request that State Wide LMR planning be included in the 10 year plan.

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Telecommunications, also known as *telecom*, is the exchange of information over significant distances by electronic means, referring to all types of voice, data and video transmission. This is a broad term that includes a wide range of information-transmitting technologies and communications infrastructures, such as wired phones; mobile devices, such as cellphones; microwave communications; [fiber optics](#); satellites; radio and television broadcasting; the [internet](#); and telegraphs.

