CISCO SYSTEMS FILING PART I OF II

Southern Governors' Association Task Force:
Achieving Interoperability for Public Safety Communications

Recommendations of Cisco Systems, Inc.
March 16, 2007

Cisco Systems, Inc. ("Cisco"), the world's leading manufacturer of Internet Protocol ("IP") networking equipment and IP communications hardware and software, is grateful for the opportunity to provide the Southern Governors' Association's ("SGA's") Interoperability Task Force with the following recommendations for achieving public safety communications interoperability.

I. Introduction and Summary.

As Hurricane Katrina, the terrorist attacks of 9/11 and other crisis situations have demonstrated all too well, our federal, state and local emergency first responders do not yet possess the means to communicate effectively in times of crisis. The SGA has an important opportunity to make its views heard on the challenges facing public safety communications. As detailed below, Cisco recommends that the SGA:

- Call upon Congress to ensure that the Digital Television transition remains on track for February 17, 2009, enabling public safety to use 24 MHz of 700 MHz band spectrum previously used by broadcasters and to receive auction proceeds earmarked for public safety interoperability;
- Demand that federal policymakers and public safety entities first solve the voice interoperability problem;
- Require your state public safety decision-makers to consider the use of IP-based interoperability systems that allow legacy public safety radio systems to interoperate, and that are "future-proofed" to interoperate with new systems;
- Support the Federal Communications Commission's (FCC's) recent proposal to create a national, interoperable broadband public safety license within the current 700 MHz public safety allocation;
- Urge Congress to continue funding public safety communications improvements that produce a measurable benefit to interoperability and that support a nationwide interoperable public safety broadband network within the 24 MHz allocation; and
- Request clarification from the Department of Commerce that the $1 billion interoperability fund, created by Congress for funding commitments in the current fiscal year, can be applied to more than simply 700 MHz radios and radio systems.

First and foremost, the Governors should support Congress's goal of transitioning a large block of television spectrum to commercial and public safety uses on February 17, 2009. The digital television transition will ensure that two important things happen: (1) 24 MHz of

spectrum is made available to public safety, as has been promised since 1997, and (2) public safety entities will receive $1 billion in federal assistance to be used to solve the interoperability problem. Additional funds will be made available by Congress to continue the process of making Public Safety Answering Points (PSAPs) E911 compliant. This enormous commitment of federal resources was made possible by anticipated revenues from the auction of 60 MHz of commercial spectrum that will occur later this year. The prospect of this auction allowed Congress to identify and spend $1 billion of those anticipated revenues on interoperability. It is therefore critical that, in any action that SGA takes in response to this request for comment, the organization support the DTV transition.

In addition, as the National Governors Association's issue brief on public safety wireless interoperability recently made clear, state governors play a crucial leadership role in the achievement of interoperability.[1] Governors can foster a governance process within their states that encourages collaborative and statewide planning, support the development of flexible and open architectures and standards, and propose funding for interoperability. The issue brief largely focused on the need for the FCC to clear 24 MHz of spectrum in the 700 MHz television band for public safety use and the need to fund new radio systems, but it did not highlight the fact that robust IP-based technology solutions for voice interoperability already exist and are available at approximately one-tenth the cost of radio replacement strategies. The SGA should fill this gap by emphasizing the utility of IP-based systems that enable public safety users on different wireless systems, using different technologies, to speak to each other using push-to-talk functionality. Once installed, these systems allow legacy radio systems to interoperate with other radio systems and voice platforms. Many of these systems, including Cisco's, are designed in order to support data and video interoperability going-forward.

In Cisco's view, the first action government can and should take in addressing public safety interoperability is to break down the existing voice "silos" that prevent our first responders from collaborating and communicating. The good news is that measurable improvements in achieving voice interoperability can be made immediately using IP systems for a fraction of the cost that would be incurred if our nation replaced all first responder radios. In addition, it means that radio systems that today have useful life can continue to be operated until they need replacement. Resources that otherwise would have been directed to purchasing new 700 MHz radios can be redirected toward needed broadband capabilities. IP-based interoperability solutions are so important that the governors should consider requiring their state public safety officials to consider IP-based interoperability solutions when they create statewide interoperability plans.

A new nationwide public safety wireless broadband network in the existing public safety band will give first responders the opportunity to develop new tools to respond to everything from routine events to large-scale disasters. Deploying broadband capability will provide an efficient and uniform platform on which interoperable public safety and homeland security applications can be easily run. This new network will be capable of offering countless new and needed applications, including interoperable voice communications, remote video monitoring at command sites, video information for officers on patrol, cross-jurisdictional database messaging

[1] "Strategies for States To Achieve Public Safety Wireless Interoperability," Issue Brief, NGA Center for Best Practices, November 20, 2006.

and ambulance-hospital video links. These benefits can best be achieved if the new public safety broadband network is designed to allow for the interoperable use of multiple IP-based video and data applications and to facilitate the introduction of new applications and technologies as they are developed.

Public safety interoperability needs can be successfully met within the existing spectrum allocated for public safety use. Those existing allocations are currently slated for outmoded narrowband and wideband applications that repeat, rather than resolve, the problems that have plagued public safety communications. Seizing this opportunity, the FCC has wisely proposed to create a nationwide, interoperable broadband public safety network that affords an opportunity to eliminate inefficiencies inherent in the current plans and to create a robust, reliable and adaptable interoperable public safety communications network. Alternative schemes to change the law and reallocate spectrum to public safety from commercial bands threaten the DTV transition and vital mechanisms to fund public safety interoperability. Therefore Cisco believes the FCC's proposal provides the better course and is worthy of the SGA's support.

Funding for public safety interoperability and public safety radio systems also needs SGA support. The $1 billion in federal interoperability funding scheduled to occur this year, and the $2.1 billion committed by the U.S. Department of Homeland Security ("DHS") since 9/11, are an important start to ensuring that public safety has the communications tools it needs. But it is only a start. The SGA should encourage Congress to move forward with additional funding directed at interoperability systems, such as IP-systems, as well as new radio systems, especially those that support broadband.

In addition, the SGA should ask the U.S. Department of Commerce's National Telecommunications and Information Administration to confirm its intent to award grants under the $1 billion grant program to grantees proposing solutions other than new 700 MHz radio systems. The recently-released Memorandum of Understanding between the Departments of Commerce and Homeland Security indicates that the DHS grants guidance document will in part govern the distribution of grant awards, and that document allows money for 700 MHz radios, existing radio systems and IP-based interoperability systems. The Governors should request confirmation and clarification to ensure that their state and local agencies can receive funding even if they do not wish to build new 700 MHz radio systems.