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VIA ELECTRONIC MAIL

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1401 Constitution Avenue, N.W., Room 4898
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Re: Comments to the Joint Advisory Committee on Communications Capabilities of
Emergency Medical and Public Health Care Facilities

Dear Ms. Fowlkes and Mr. Werner:

Southern Communications Services, Inc. d/b/a SouthernLINC Wireless (“SouthernLINC Wireless”) respectfully provides the Joint Committee with the following comments regarding the communications capabilities and needs of emergency medical and public health care facilities. Specifically, SouthernLINC Wireless supports Syniverse Technologies’ recommendation to the Joint Committee that automatic roaming for both voice and data services be considered a critical communications capability for such facilities.¹

About SouthernLINC Wireless

SouthernLINC Wireless is a wholly owned subsidiary of Southern Company. SouthernLINC Wireless operates a commercial digital 800 MHz ESMR system using Motorola’s proprietary Integrated Digital Enhanced Network (iDEN) technology to provide interconnected voice, “push-to-talk” dispatch, Internet access, and data transmission services over the same handset. SouthernLINC Wireless provides these services to approximately 300,000 subscribers in a 127,000 square mile service territory covering Georgia, Alabama, southeastern Mississippi, and the panhandle of Florida. SouthernLINC Wireless serves the extensive rural territory within its footprint as well as major metropolitan areas and highway corridors.

¹ / Comments of Syniverse Technologies, submitted to the Joint Advisory Committee on December 13, 2007.

Because of its expansive and reliable coverage within the region, SouthernLINC Wireless' service is widely used by local and statewide public safety agencies, federal, state, and local government agencies, public utilities, and emergency medical service providers, including ambulance companies, air ambulance services, and emergency room and public health care facilities. For example, SouthernLINC Wireless provides vital mobile communications services to participants in the Birmingham Regional Emergency Medical Service Systems ("BREMSS"), a regional organization responsible for coordinating emergency response, care, and services in the seven-county area around Birmingham, Alabama. The following excerpt from the BREMSS website (www.bremss.org) describes the BREMSS communications system:

A state-of-the-art communications system that ties all hospitals as well as all major EMS transport agencies is an example of regional cooperation, planning, and implementation. This EMS Communications system, which was implemented at no initial cost to hospitals, is a unique partnership between a commercial provider (Southern LINC), local governments, commercial ambulance services, hospitals, 911 centers, emergency management agencies, and fire services. BREMSS was able to envision the system and through continual work implement a region-wide system and, ultimately, implementation of a statewide EMS Communication System is possible.²

The Importance of Automatic Roaming for Voice and Data Services

Automatic roaming allows subscribers of mobile wireless services, such as paramedics and other emergency responders, to make and receive communications outside of the coverage area of their "home" network without taking any action other than turning on their device. To enable automatic roaming, there must be a roaming agreement in place between the operators of the roamed-on (or "host") network and the subscriber's home network.

The public safety benefits of automatic roaming for mobile voice services for emergency responders are immediately clear, and the FCC has taken a significant step towards ensuring that these benefits are realized through its adoption in 2007 of automatic roaming rules for voice, push-to-talk, and short text messaging services. However, in addition to voice, mobile wireless data services are also fulfilling an increasingly important, multi-faceted role in addressing vital public safety needs.

To begin with, the wireless industry uniformly recognizes that mobile data services can save lives. In emergency situations when voice networks may not be available due to traffic congestion or other factors, wireless data services offer a critical, even life-saving, alternative means of communication. For example, as noted by the Katrina Panel established by the Federal Communications Commission in 2006, "text messaging was used successfully during the crisis

² / See http://www.bremss.org/index_files/Menu.htm

and appeared to offer communications when the voice networks became overloaded with traffic.”³

However, the Katrina Panel also understood that the impact and capabilities of mobile data services extend well beyond text messaging. Mobile data services also include services such as e-mail (*e.g.*, BlackBerry and similar services), instant messaging, mapping and navigation services, Internet access, and other Internet-enabled services and technologies. All of these services are already used and relied on by emergency medical and public health facilities and emergency responders across the nation. In an emergency, wireless subscribers, including emergency service providers, demand and require seamless access to the wireless services they rely on wherever they may be.

In recognition of the fact that emergencies can result in significant disruption to voice and data communications services carried over landline facilities, the Katrina Panel recommended that readiness checklists for the communications industry should include, among other things, the identification of “alternate communications channels, such as alpha pagers, Internet, satellite phones, VoIP, private lines, BlackBerry devices, etc.”⁴ Without automatic roaming for data services, the value of “alternate” communications channels is significantly diminished.

The life-saving capabilities of mobile data services are not limited to large-scale emergencies, however, as these services can – and have been – used in individual emergencies when voice services are not accessible. Without access to roaming for mobile wireless data services, people caught in emergencies may be cut off from potentially life-saving communications.

SouthernLINC Wireless agrees with Syniverse that “[t]he ability of wireless devices to find network services and features in the time of emergency is important and automatic roaming should be considered a critical communications capability for Emergency Medical and Public Health Care Facilities.” Emergencies do not respect geographic or network coverage boundaries, and large-scale emergencies, such as 9/11 or the 2005 Gulf Coast hurricanes, can require emergency resources from multiple jurisdictions from tens or hundreds of miles away.

During such times, the need for communications is just as critical – if not more so – for emergency responders who find themselves operating in areas not covered by their home network. Without access to vital voice and data communications through automatic roaming, their ability to provide emergency services is degraded and lives could be lost. SouthernLINC Wireless itself serves many public safety and utility subscribers within its region who may be – and frequently are – called on to assist in emergencies or disaster recovery efforts outside of SouthernLINC Wireless’ service territory, and these subscribers rely on the full range of wireless voice, push-to-talk, and data communications services in order to carry out their duties.

³ / Independent Panel Reviewing the Impact of Hurricane Katrina on Communications Networks, *Report and Recommendations to the Federal Communications Commission*, June 12, 2006, at 9 – 10.

⁴ / *Id.* at 31.

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Although the Joint Committee was formed in response to Congress' desire to implement the recommendations of the 9/11 Commission, SouthernLINC Wireless submits that the experiences and lessons of the 2005 Gulf Coast hurricanes – Katrina, Rita, and Wilma – are just as applicable to the Joint Committee's considerations. When Hurricane Katrina slammed into the Gulf Coast region on August 29, 2005, both regional and nationwide carriers immediately launched large-scale efforts to restore wireless services which – due to the destruction of many landline facilities throughout the region, as well as the loss of many public safety communications facilities – were for a time the primary means of communication not only for the public at large, but also for public safety and emergency responders and government agencies, from hospitals and emergency rooms to the U.S. Coast Guard. However, without automatic roaming for all mobile wireless services, the benefits of such efforts can be lost entirely.

The public interest need for automatic roaming for mobile wireless voice and data services is clear and compelling. The Joint Committee should therefore consider automatic roaming for all mobile wireless services to be a critical communications capability for emergency medical and public health care facilities and should recommend in its Report to Congress that government action be taken to ensure the availability of automatic roaming for these services for all subscribers.

Respectfully submitted,



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