



American Association
of Paging Carriers

*“The Voice of
US Paging
Carriers”*



September 23, 2005

The Honorable Kevin J. Martin
Chairman, Federal Communications Commission
445 – 12th Street, SW
Washington, DC 20554

Re: Improvement of network reliability and public safety
communications in times of crisis

Dear Chairman Martin:

The American Association of Paging Carriers (AAPC) and USA Mobility, Inc. commend you for your strong leadership of the Federal Communications Commission at a time when the communications capability of our nation in disastrous situations has been sorely tested. We look forward to working with the Commission and the independent expert panel you are establishing to review the impact of Hurricane Katrina, and now Hurricane Rita, on the nation’s communication infrastructure, and to make recommendations on ways to improve disaster preparedness, network reliability, and communication among first responders such as police, fire fighters and emergency medical personnel. We are writing to urge that you appoint a representative from the paging industry to service on the panel you are establishing.

AAPC is the national trade association representing paging carriers throughout the United States; and its members operate nationwide, regional and local paging systems licensed under Parts 22, 24 and 90 of the Commission’s rules. USA Mobility is the largest paging carrier in the industry, serving more than half of the industry’s customers. The critical link provided by paging service to first responders in crisis environments, when voice communication networks are overloaded or otherwise fail, has been repeatedly acknowledged by independent observers. For example, the Arlington County After-Action Report on the Response to the September 11 Terrorist Attack on the Pentagon (the “AAR”) (undated), studied the activities of Arlington County and the supporting jurisdictions, government agencies, and other organizations in response to the September 11, 2001, terrorist attack on the Pentagon. The AAR found that:

Almost all aspects of communication continue to be problematic, from initial notification to tactical operations. Cellular telephones were of little value in the first few hours and cellular priority access service (CPAS) is not provided to emergency responders. Radio channels were initially oversaturated and interoperability problems among jurisdictions and agencies persist. (AAR at p. 9).

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Dr. Peter Kapsales, senior consulting engineer for CACI Technologies, also has acknowledged the benefits of two-way paging for crisis communications in a March 2004 article entitled "Wireless Messaging for Homeland Security" (http://braddye.com/homeland_security.html). He concluded that two-way paging "is more reliable and more effective than the current voice networks used by emergency workers and public employees who respond to critical situations" and "should be considered a primary or backup system to improve real-time communication among emergency personnel during critical periods when voice communication is not practical or fails."

Most recently, a communications specialist deployed by FEMA in Urban Search and Rescue in the aftermath of Hurricane Katrina, wrote to the Wireless Messaging Newsletter when "the cell and data service down and systems being flooded," that "ReFLEX [two-way paging] is working fine and communications are flowing through the units! . . . Again the critical use of the ReFLEX in . . . all the disaster situations I have been to (9/11 NYC, Ivan, Isabel and now Katrina!)" (<http://www.pagingcarriers.org>).

One of the important reasons for the continued reliability of paging service during disasters is its extensive use of geostationary satellite control and transmission links, not just terrestrial facilities, as part of its network infrastructure.

AAPC and USA Mobility stand ready to work with you, the Commission and the independent panel to help lay the foundation for more effective communications during future crises. To this end, and in light of the critical and unique contributions of paging service during such times, we strongly urge you to appoint a representative from the paging industry to serve as a member of the independent panel you are in the process of establishing.

Please do not hesitate to contact either of the undersigned to discuss specific representatives qualified and ready to serve in this important capacity.

Very truly yours,



Vincent D. Kelly
Chief Executive Officer
USA Mobility, Inc.



Bruce Deer
President
American Association of Paging Carriers

cc: Commissioner Kathleen Q. Abernathy
Commissioner Michael J. Copps
Commissioner Jonathan F. Adelstein