



## IAFC/NFPA Metropolitan Fire Chiefs Association



3153 Amalfi Drive, Orlando, FL 32820. Tel: 617-639-3347 Email: Odrozd@NFPA.org Website: www.nfpa.org/metro

February 13, 2024

The Honorable Jessica Rosenworcel Chairwoman Federal Communications Commission 45 L Street, NE Washington, D.C. 20554

Dear Madam Chairwoman,

I am writing on behalf of the members of the Metropolitan Fire Chiefs Association to convey our appreciation to you and the other Commissioners for preserving the 4.9 GHz band for public safety.

The Metropolitan Fire Chiefs Association (Metro) is a premier organization in the United States, uniting the leaders of more than 150,000 firefighters. These professionals protect over 150 million residents across the nation's largest cities, operating in diverse settings from bustling urban centers to rural areas. Beyond its representational role, the Metro is dedicated to advancing fire and emergency service through advocacy, education, and the development of best practices. Communication stands as a pivotal focus for the association, ensuring that members across all regions have access to the latest strategies, technologies, and collaborative networks to enhance their lifesaving capabilities.

As the Commission takes steps to develop new rules for the 4.9 GHz band to increase its utilization by fire services and other first responders, the Metro would like to share our perspective as our members are the end-users in the field and rely on these communications to protect themselves and the public.

We support the Commission's decision to dedicate the 4.9 GHz band exclusively to public safety, mandating priority, and preemption for these uses over any others and establishing a nationwide framework to fulfill public safety's increasing demand for dedicated 5G spectrum. A fragmented, inconsistent approach, allowing varied uses based on location or licensee, has proven ineffective. For two decades, this has led to the band's chronic underutilization due to the absence of a unified strategy and economies of scale, stifling both usage and innovation. The new, centralized framework is essential for maximizing the band's potential and spurring innovation.

The 4.9 GHz band, while currently underutilized, is crucial for existing and future State and local public safety operations. The band manager should ensure that these incumbent licensees retain priority access. Effective frequency coordination and spectrum management will make the band available for public safety 5G nationwide, free from interference. The advent of 5G technology





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promises to enhance emergency response and public safety with faster, more reliable communications. The mid-band spectrum is vital for these advancements. Our personnel's need for a dedicated 5G spectrum is urgent, and the 4.9 GHz band is ideally suited for immediate and future needs. We must not overlook this opportunity due to misunderstandings of the public safety mission by opportunists or well-meaning individuals. It's critical that the voices of public safety practitioners, especially those in the field, are heard and prioritized, as our safety and effectiveness depend on it.

In recent months, there has been a concerted effort by organizations—many of which are not public safety—to sow doubt about public safety's vision for how to reform the 4.9 GHz band. They have shrouded their mission under the false banner of "local control" and falsely claim incumbent licensees would lose access to the band if it is operationalized for nationwide 5G. Under their plan, the fractured, decentralized approach would continue—thus limiting the utilization of the band for the benefit of public safety.

We urge you to reject these arguments. The Metro Chiefs represent and advocate for the leadership within fire departments serving their communities. We are not a lobbying or public relations firm. We do not represent vendors or wireless providers, nor do we engage in decision-making regarding contracts for these services for fire departments. There is no economic benefit or consideration whatsoever. Our views reflect those of the end-users—the men and women on the front lines who face danger and who depend on their ability to communicate effectively. This must be the primary and sole consideration guiding our decisions.

The Metropolitan Fire Chiefs Association's members extend their gratitude for your leadership and attentiveness to our perspectives on these critical issues. Should you require further details about this bill, please feel free to reach out to either myself or Executive Secretary Otto Drozd III in our office.

Sincerely

Chief Edward "Loy" Senter

Edward L. Senter In

President

Metropolitan Fire Chiefs Association

cc: The Honorable Brendan Carr, Commissioner, Federal Communications Commission
The Honorable Geoffrey Starks, Commissioner, Federal Communications Commission
The Honorable Nathan Simington, Commissioner, Federal Communications Commission





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The Honorable Anna M. Gomez, Commissioner, Federal Communications Commission

About the Metropolitan Fire Chiefs Association - The Metropolitan Fire Chiefs Association, often referred to as Metro, unites fire chiefs hailing from prominent metropolitan fire departments. Our members proudly hold dual affiliations with the IAFC (International Association of Fire Chiefs) and NFPA (National Fire Protection Association). Together, we endeavor to cultivate a dynamic exchange of knowledge that effectively addresses significant policy issues, not only within the United States but also on the global stage. Our esteemed members occupy leadership positions within fire departments serving communities where over 150,000 dedicated firefighters protect and serve nearly 150 million residents.