

DEPARTMENT OF EMERGENCY MANAGEMENT & HOMELAND SECURITY
Communication Interoperability Working Group

February 20, 2007 Minutes
DOT Central Lab, Rocky Hill, CT

WELCOME, PUBLIC COMMENT AND REVIEW OF MINUTES:

The meeting was called to order at 1312 hours by the Co-Chair, Michael Varney. The following individuals were in attendance: Stephan Brown (DOT), George Carbonell (ConnDOT), Bob DiBella (DEMHS), John Gustafson (CMED-NH), John Masciadelli (OSET), Jeff Merwin (SW-CMED), Jeff Otto (QVEC), George Pohorilak(OSET), Gordon Shand (DPH), Mike Stemmler (DPS), Richard Terbusch (Judicial), Lee Toffey (DEMHS), Matt Valleau (CAP/DPS), Michael Varney (DOIT/CFCA), Keith Victor (CREPC), John Warren (Military) and Jerry Zarwanski (OSET).

Minutes of the January 17, 2007 meeting reviewed; motion to accept by John Gustafson, second by George Carbonell, unanimous/moved and will be posted on the DEMHS website.

There were no public comments.

SUB-COMMITTEE REPORTS:

- A. Technical Committee: Presented by George Carbonell. STOC's boxes are on display on the side of the room. Testing was done today and the comments will be reviewed. The boxes are available for two weeks for testing at which time a decision will be made on whether to purchase or go to the next vendor on the list. The plan is to purchase 100 units which will be distributed around the state (locations are yet to be determined) at an estimated cost of between \$6-7,000 each.
- B. Training & Exercise Workgroup: The committee has not met but if you are interested in being involved, please contact Michael Varney.

REPORT OF INTEROPERABILITY USAGE AND INCIDENTS:

- A. STOC's channels were used in direct mode as part of the hazmat drill in New Haven.
- B. Used by New Haven Fire and the Marine CBRNE response group from Washington, DC.

OLD BUSINESS:

- A. Portable Radio Inventory & Training Program: Mike Varney reported that training is being delivered through the Fire Academy. Gordon Shand asked if the STOC's frequencies were going to be added to the ITAC/ICALL radios. Discussion. Motion made by Gordon Shand to put the STOC's frequencies in the ITAC/ICALL radios on Bank A, second by John Gustafson, carried unanimously. Bank C and C-SPERN issues to be referred to the Technical Committee.
- B. ITAC/ICALL Monthly Testing & Training Issues: None
- C. Homeland Security Grant Program: reported by Michael Varney in Libby Graham's absence. No significant changes from last month. Some numbers have been finalized and much will depend upon the final cost of the STOC's boxes. Continuing work on the maintenance package for ITAC/ICALL control stations and another battery purchase.
- D. Prime Mover Radios & Licensing: Michael Varney met with Commissioner Thomas and Director Hackett to discuss situation. DEMHS will license the prime movers and the

decon trailers for the municipalities. Jeff Otto asked if those radios would be reprogrammed also during the 800MHz rebanding. Mike Varney responded yes.

- E. USAR CT-TF1 radios: Michael Varney reported that the radios have been programmed and the channels have been identified. Medical channels will be included in the programming All 50 ITAC/ICALL radios borrowed will be returned to Public Safety by the end of the month. Gordon Shand advised that there are 96 channels on the USAR radios.
- F. Unit Leader Training: There was a summer class held in Fairfield. Comments on the training were to be submitted by today. The training will be sent to the NIMS Integration center for review for possible National use by the end of this week.
- G. Transit Security Grant: Grant was issued to New York City metropolitan Area. Ct proposal is to extend Vcall/Ucall from Greenwich to New Haven. The total grant award is awaiting final approval.

NEW BUSINESS:

- A. National Governor's Association Workshop – in conjunction with SafeComm for Public Safety Communications Interoperability. State of CT representatives chosen by the Governor's Office and Commissioner Thomas are Michael Varney, George Pohorilak, George Carbonell, John Gustafson and Keith Victor. Topics at workshop will include: State's Best Practices, Statewide Planning Process, SafeComm Methodology (including 5 tracts) and breakout sessions. A discussion on the 700 MHz system and the \$1 Billion set aside to pay for the program was held by the group attending.
- B. DEMHS Advisor – the March issue of the DEMHS Advisor Newsletter will focus on Interoperable Communications. STOC's guidance will be included in the newsletter. Anyone having information that they feel is appropriate to this issue please send it to Michael Varney by the end of this week. Gordon Shand suggested adding the contact info for a POC in case anyone had radio questions.
- C. New Technical Contact from DHS is Bill Godfrey who replaces Leo Guillmet. Doug Harder is still the POC for Technical requests. He can accept requests on a regional or statewide basis, but not for individual towns.
- D. Updates from Regional Representatives –
 - Reg. 1 – Jeff Merwin – Region 1 Emergency Communications Planning Committee will have it's first meeting with Chief McCarthy as temporary chair, to be held at Troop G.
 - Reg. 2 – John Gustafson – no report
 - Reg. 3 – Keith Victor – looking at UHF channel for repeater to tie inter-city communications together.
 - Reg. 4 – Jeff Otto – New London Chief's Association working on putting together a trailer for communications in the region.
 - Reg. 5 – Tom Vannini – absent, no report.
- E. George Pohorilak asked about the issue of vendor presentations at meeting and did Brenda Bergeron review the issue. Per Michael Varney, Brenda did review and will draft some guidance. There will be no vendor presentations at meetings.
- F. Jerry Zarwanski advised that NU requested the use of the 220MHZ spectrum in CT. John Gustafson made a motion to add this to the agenda for discussion, second by Jeff Otto, unanimously added to the agenda. Discussion ensued. Request has been denied by OSET. pertinent documents will be attached to the end of the minutes.

CORRESPONDENCE/GRANT REVIEWS:

A. SHSGP grant reviews – No report in Bill Hackett's absence.

NEXT MEETING:

Next regular meeting will be **March 20, 2007, at 1300 hours**, location to be determined.

Meetings open to the public.

Motion to adjourn by Keith Victor; second by Matt Valleau; approved.
Meeting adjourned at 1420 hours.

REQUEST FOR RULE WAIVER

Northeast Utilities Service Company (“NUSCO”), in accordance with Section 1.925 of the Rules and Regulations of the Federal Communications Commission (“Commission”), respectfully requests waiver of the requirements of Section 90.719 of the Commission’s Rules and Regulations to permit NUSCO to operate in the 220.8025-220.8475/221.8025-221.8475 MHz and 220.9025-220.9225/221.9025-221.9225 MHz bands in Connecticut in accordance with the technical parameters and other specifications reflected on the associated FCC Form 601. NUSCO requests this rule waiver so that it may access sufficient spectrum in the 220 MHz range to meet its voice and data requirements throughout its electric and gas distribution service areas.

Background

NUSCO provides centralized accounting, administrative, information technology, engineering, financial, legal, operational, planning, purchasing and other services to the Northeast Utilities operating companies. In that regard, while the several operating companies own their own communications systems, NUSCO serves as the central FCC license holding entity for those companies.

The Northeast Utilities system companies furnish franchised retail electric service to approximately 1.9 million customers in 419 cities and towns in Connecticut, New Hampshire and western Massachusetts through three affiliate entities – The Connecticut Light and Power Company (“CL&P”), Public Service Company of New Hampshire (“PSNH”) and Western Massachusetts Electric Company (“WMECO”). CL&P alone provides electric power to more than 1.1 million customers in Connecticut.

The Northeast Utilities system also furnishes franchised retail natural gas service in a large part of Connecticut through Yankee Gas Services Company (“Yankee Gas”), a subsidiary of Yankee Energy System, Inc. (“Yankee”), the largest natural gas distribution company in Connecticut. Yankee Gas serves approximately 196,000 residential, commercial and industrial customers in 71 cities and towns in Connecticut, including large portions of the central and southwest sections of the state. Yankee Gas and CL&P employ more than 2,100 personnel.

In order to ensure the safe, reliable and efficient distribution of electricity and gas to Northeast Utilities system customers, NUSCO has acquired access to 28 12.5 kHz channel pairs in southwest Connecticut and 40 12.5 kHz channel pairs in the remainder of the state in the Automated Maritime Telecommunications System (“AMTS”) portion of the 217-220 MHz band for voice and data communications, including dispatch communications between field crews involved in the maintenance and restoration of utilities service as well as the remote control of thousands of Distribution Load Management devices for restoration and load control.¹ The geographic scope of the Northeast Utilities service area requires NUSCO to ensure integrated operations of its communications system across three states.

¹ See *in re* AMTS Consortium, LLC, to Partially Assign License for Station WQCP810 to Northeast Utilities Service Company, *Order*, DA 05-2951 (2005).

Request for Waiver

Pursuant to 47 C.F.R § 1.925, the Commission may grant a request for waiver if it is shown that: “(i) The underlying purpose of the rule(s) would not be served or would be frustrated by application to the instant case, and that a grant of the requested waiver would be in the public interest; or (ii) [i]n view of unique or unusual factual circumstances of the instant case, application of the rule(s) would be inequitable, unduly burdensome or contrary to the public interest, or the applicant has no reasonable alternative.”²

Section 90.719 restricts eligibility for the channels NUSCO seeks use of as follows:

1. 220.8025-220.8475 MHz (Channels 161-170) are available for public safety/mutual aid operations including disaster relief;
2. 220.9025-220.9225 MHz (Channels 181-185) are available for emergency medical use including the provision of basic or advanced life support.

In this instance, however, waiver of these eligibility restrictions is appropriate in light of the fact that the underlying purpose of the Commission’s rules will be frustrated by their strict application. Furthermore, grant of waiver is appropriate in view of the unique public nature of the services utility companies provide and the role of such services in ensuring public safety.

Effective utility service is vital to public safety and emergency medical operations. The Commission has consistently recognized the important public safety role that gas and electric utilities serve. Section 90.7 of the FCC’s rules includes “utilities” in the definition of Critical Infrastructure Industries (“CII”) as services used by gas and electric utility companies are “used to protect safety of life, health, or property; and are not made commercially available to the public.”³ Likewise, the Commission has held that gas and electric utility company communication services fall squarely within Congress’s definition of “public safety radio services.”⁴

Indeed, the Commission has stated that “the very nature of the services provided by [CII] entities involves potential hazard to life and property and that CII entities often work hand in hand with public safety officials at the scene of an incident” and that “reliable CII radio communications have long proven essential in speeding recovery from natural or man-made disasters”⁵

² 47 C.F.R. § 1.925.

³ See 47 C.F.R. § 90.7.

⁴ See Implementation of Sections 309(j) and 337 of the Communications Act of 1934 as Amended, *Report and Order and Further Notice of Proposed Rule Making*, 15 FCC Rcd 22709 at para. 5 (2000). See also 47 U.S.C. § 309(j)(2).

⁵ See Improving Public Safety Communications in the 800 MHz Band, Report and Order, Fifth Report and Order, Fourth Memorandum Opinion and Order, and Order, 19 FCC Rcd 14969 at n. 11 (2004). Although this specific decision was explicitly limited to the issues under consideration at the time, the core policies regarding the public safety services provided by utility companies are identical to those present in this request.

In addition, in its proceeding to study the impact of Hurricane Katrina on communications networks, the Commission recognized the critical service which utility companies provide in post-disaster situations.⁶ It also recognized the need for utilities to have robust and redundant systems in place to be able to maintain service during an emergency or in the aftermath of a natural disaster.⁷

The Commission has acknowledged the unique role that utility companies serve in ensuring safety of life and property by previously granting several waivers to utilities to utilize public safety spectrum. For example, on October 6, 2006, the FCC released an Order granting a waiver to Douglas Electric Cooperative (“DEC”), an electric co-operative utility, to permit it to share a county-wide trunked UHF communication system licensed to the county of Douglas, Oregon. This was necessary as DEC was not otherwise eligible to hold licenses in public safety spectrum. The Commission noted that “[p]ermitting sharing in this case will allow for better overall communications between DEC headquarters facilities and its utility maintenance crews in the field, thereby enhancing crew safety and facilitating prompt repair of its power delivery system, which is important to the residents of Douglas County.”⁸

Similarly, on June 5, 2006, the FCC released an Order granting a waiver of Section 90.617 of its rules to Ameren Services Company, a major utility company, to permit it to use 800 MHz frequencies allocated to public safety. In doing so, the Commission noted Ameren’s statement that the waiver was necessary to ensure reliable and secure communications, especially during emergencies when the public safety may be affected.

Waiver is Appropriate in this Instance

In this instance, safety of life and property would be jeopardized by strict application of the eligibility requirements of Section 90.719. The capacity available on NUSCO’s current 220 MHz communications system is insufficient to both meet the company’s growing demands and to ensure the integrated operations of the company’s three State communications system.

⁶ See Recommendations of the Independent Katrina Panel Reviewing the Impact of Hurricane on Communications Networks, EB Docket No. 06-119, FCC 06-83 at 5 (2006) Reciting the Independent Katrina Panel’s recommendations that the Commission encourage regional, state and local emergency operating centers and the Joint Field Office to “facilitate electric and other utilities’ maintenance of priority lists for commercial power restoration.”

⁷ *Id* at 12.

⁸ See Douglas Electric Cooperative Request for Waiver of Section 90.179 of the Commission’s Rules, DA 06-1996 at para. 6 (October 6, 2006). The Commission has granted similar waivers to electric utilities in multiple instances in the past. See American Electric Power Service Corporation Request for Waiver of Section 90.179 of the Commission’s Rules, Order, 15 FCC Rcd 15553 (2000); Commonwealth of Pennsylvania and GPU Energy request for Waiver of Section 90.179 of the Commission’s Rules, Order, 13 FCC Rcd 8787 (1997); See Entergy Nuclear Indian Point 2, LLC, Request for Waiver of Section 90.179(a) of the Commission’s Rules, File No. 0001242437, Order, 19 FCC Rcd 21256 (Chief, PSCID, WTB 2004) and Dominion Virginia Power, Request for Waiver of Section 90.20 of the Commission’s Rules, Order, 19 FCC Rcd 12254 (Chief, PSCID, WTB 2004). While each of these waivers dealt with slightly differing factual backgrounds, both from each other and from this request, they each demonstrate the important role that utilities serve in protecting the public safety.

Limiting the ability of NUSCO to meet its communications needs will inhibit the Northeast Utilities companies' ability to respond effectively to events such as service outages and disaster situations -- jeopardizing public safety and emergency medical services. Restricting spectrum available to NUSCO will also prevent the Northeast Utilities companies from coordinating efficiently with emergency response personnel in such situations.

Furthermore, the critical importance of radio communications to the public interest is underscored by incidents such as the recent weather events of the weekend of October 27-29, 2006 during which record rain fall and winds in the Northeastern U.S. interrupted power delivery to thousands of residents in the areas served by NUSCO affiliates.⁹ Adequate communications are essential if gas and electric utilities are to respond consistent with their public mission in the aftermath of such events. It is imperative that gas and electric utility radio communications remain reliable and secure.

Use of additional channels in the 220 MHz band will allow NUSCO to ensure adequate dispatch communications and remote control of load management and restoration devices for the Northeast Utilities companies. As NUSCO's current communications system is authorized to operate using spectrum in the 220 MHz band, use of additional 220 MHz band channels will enable to NUSCO to expand its communications capabilities while conserving resources and avoiding costly, duplicative and unduly burdensome capital outlays. While NUSCO has been able to secure as many as 40 12.5 kHz channel pairs in the AMTS portion of the 217-220 MHz band through the secondary market,¹⁰ further options for adequate spectrum in the areas subject to this request, particularly in the areas of southwest Connecticut in which NUSCO was able to obtain rights to only 28 12.5 kHz channel pairs, do not exist in the 220 MHz band apart from the channels subject to this request.

NUSCO is requesting access to the subject public safety/emergency medical channel pairs under unique circumstances, and notes that there are no reasonable alternatives for its proposed operation that would provide secure, reliable communications to be used to support the safe and efficient delivery and restoration of utility service to the public. Radio services used to support gas and electric utility company operations are atypical in that they must cover wide geographic areas. In this instance, NUSCO must be able to ensure reliable service coverage throughout a large portion of the state of Connecticut and operations must be integrated into a company-wide network spanning three States. In addition, given the often hazardous nature of the operations supported by NUSCO's radio system and the critical role that the system provides to protection of life and property, NUSCO must be able to reasonably guarantee that its operations will be interference-free. NUSCO has spent considerable time and resources evaluating its communications alternatives and has eliminated all other spectrum bands as options for meeting its spectrum capacity needs. Spectrum options meeting the required criteria simply do not exist in NUSCO's service area outside of the 220 MHz band. Included herewith is a letter from the United Telecom Council, an FCC-certified frequency coordinator for business and industrial channels, illustrating the complete lack of suitable spectrum alternatives faced by

⁹ See Loretta Waldman, Wind Topples Trees, Cuts Power, Hartford Courant (October 30, 2006) (available online at: <http://www.courant.com/news/local/hc-winds1030...artoct30.0.6800874.story?coll=hc-headlines-local>).

¹⁰ See *in re* AMTS Consortium, LLC, to Partially Assign License for Station WQCP810 to Northeast Utilities Service Company, *Order*, DA 05-2951 (2005).

NUSCO. The letter confirms NUSCO's own studies and, in fact, highlights the very shortages which have caused NUSCO to seek to operate in the 220 MHz band.

Perhaps most importantly, grant of the requested waiver will promote the efficient use of 220 MHz spectrum that would otherwise continue to lie fallow. In fact, although the FCC has allocated channels 161-170 to public safety entities since 1991¹¹ and channels 181-185 to emergency medical providers since 1993,¹² the Commission's records do not reflect any confirmed operations on the requested channels in the vicinity of the locations in which NUSCO wishes to provide service. The Commission itself has expressed concern that these channels may go underutilized by public safety/emergency medical eligible entities and has indicated a potential willingness to designate these channels for other uses.¹³ Moreover, Congress has stated its objective that otherwise unassigned frequencies should be allocated to entities seeking to provide public safety services.¹⁴ Grant of this waiver would allow unused spectrum to be put to use by a CII entity in a manner that the Commission has already determined to be consistent with public safety objectives.

NUSCO has coordinated this application with the International Municipal Signal Association, a public safety frequency coordinator. Thus, grant of waiver in this instance will not adversely impact public safety operations.

For the reasons provided above, NUSCO respectfully submits that waiver of Section 90.719 of the Commission's rules is appropriate in this instance.

Should the Commission require additional information, it is requested to contact: Wayne V. Black, Keller and Heckman LLP, 1001 G Street NW, Washington, DC 20001; 202-434-4130; black@khlaw.com or Gregory Kunkle at 202-434-4178; e-mail kunkle@khlaw.com.

¹¹ See Amendment of Part 90 of the Commission's Rules to Provide for the Use of the 220-222 MHz Band by the Private Land Mobile Radio Services, *Report and Order*, 6 FCC Rcd 2356 (1991).

¹² See Amendment of Part 90 of the Commission's Rules to Create the Emergency Medical Radio Service, *Report and Order*, 8 FCC Rcd 1454 (1993).

¹³ See Amendment of Part 90 of the Commission's Rules to Provide for the Use of the 220-222 MHz Band by the Private Land Mobile Radio Service, *Third Report and Order*, 12 FCC Rcd 10943 at para. 62 (1997).

¹⁴ See 47 U.S.C. § 337(c).

**Northeast Utilities Service Company
Statement
RE: Item 50, Form 601**

NRC Office of Investigations and U.S. Attorney Investigations and Related Matters

(NU) On September 27, 1999, NUSCO pled guilty to six counts of violating the federal Clean Water Act at the Millstone and Devon Facilities. On the same date, NNECO pled guilty to 19 counts of violating the Atomic Energy Act by submitting false and inaccurate operator license applications to the NRC. Each company was ordered to pay a \$3.35 million fine and was placed on probation for three years. Each company also agreed to make \$1.65 million in non-deductible charitable contributions. NU, NUSCO and NNECO also entered into a compliance agreement with the EPA under which they will implement an environmental management system for all operational NU facilities. This resolves all pending federal criminal investigations of NU system companies.

For more information regarding this matter, see "Part I, Item 3 - Legal Proceedings" in NU's 1998 Annual Report on Form 10-K.

Northeast Utilities Service Company submits that the grant of the application associated with this Statement will be in the public interest because such action is necessary for the continued provision of telecommunications essential to the delivery of electric service to customers throughout the franchise areas of the Northeast Utilities operating companies that serve portions of Connecticut, Massachusetts and New Hampshire. Moreover, the conduct upon which the foregoing convictions and allegations were based is unrelated to the telecommunications activities covered by this application.



December 27, 2006

Northeast Utilities Service Company
C/o Keller and Heckman
1001 G Street N.W.
Suite 500 West
Washington DC 20001

*Attn: Wayne Black, Esq

Re Application for 220-222 MHz Land Mobile Spectrum

Dear Mr. Black

Northeast Utilities Service Company (NUSC) has filed applications for radio frequency spectrum in the 220-222 MHz band to support fixed base, mobile and data applications. The applications request authorization at twenty three fixed locations and their associated mobile areas, and ask for multiple channels per location. Four applications were filed with the FCC, along with a request for Rule waiver to allow access to channels allocated for public safety operation. The applications were submitted with affirmative frequency recommendations for the public safety coordinator International Municipal Signal Association (IMSA).

The Federal Communications Commission (FCC) recommended the applicant to provide evidence that no comparable channels are available in the frequency bands that would normally support NUSC's operations. NUSC requested that the United Telecom Council (UTC), an FCC-certified frequency coordinator for business and industrial channels, to review the requested facilities and provide documentation as to the availability of alternative spectrum.

In its evaluation of alternative spectrum, UTC eliminated (1) the 935-940 MHz band because of a regulatory freeze on new applications, (2) the 851-869 MHz band due to spectrum congestion and the on-going rebanding effort, (3) the 1427-1432 MHz band because voice operations are not permitted, (4) the 30-50 MHz VHF low band spectrum due to incompatibility with the proposed use of the band and (5) 470-512 MHz UHF TV band because it is not available at all locations.. This leaves VHF high band, approximately 150-170 MHz and UHF at 450-470 MHz.

Based on the number of channels requested by NUSC and the need for relatively exclusive access due to proposed data applications, UTC has determined that alternative spectrum is not available in the VHF and UHF frequency bands available to business and industrial applicants. Specifically, there are no channels in the areas requested that have no fixed or mobile users less than 20 miles from the proposed locations.

Wayne Black, Esq.
December 27, 2006
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Please feel free to contact Marie Hawkins at 703.558.0516 or the undersigned at 703.558.2204 if more information is needed concerning this analysis.

Sincerely,

A handwritten signature in black ink that reads "Klaus Bender". The signature is written in a cursive style with a long horizontal line extending to the right.

Klaus Bender, PE
Director of Engineering
UTC Spectrum Services

Cc: Jill Lyon, Esq.

IMSA

INTERCOORDINATOR CONCURRENCE REQUEST

APPLICANT: NORTHEAST UTILITIES SERVICE COMPANY

STATE: CT

IMSA ID# 06102316034952

COORDINATOR: RICHARD KINSMAN

DATE: 01/31/2007

REPLY DATE: 02/08/2007

<u>FREQUENCY</u>	<u>REQUESTED FROM</u>	<u>FEEABLE</u>
220.8025	AASHTO, APCO, FCCA	N
221.8025	AASHTO, APCO, FCCA	N
220.8175	AASHTO, APCO, FCCA	N
221.8175	AASHTO, APCO, FCCA	N
220.8325	AASHTO, APCO, FCCA	N
221.8325	AASHTO, APCO, FCCA	N
220.8475	AASHTO, APCO, FCCA	N
221.8475	AASHTO, APCO, FCCA	N
220.9125	AASHTO, APCO, FCCA	N
221.9125	AASHTO, APCO, FCCA	N

COMMENTS: APPLICATION IS AN (IG) FILING THROUGH IMSA VIA WAIVER PER FCC INSTRUCTIONS

REPLY COMMENTS:

From: Zarwanski, Jerry

Sent: Monday, February 05, 2007 11:34 AM

To: 'Michelle Fink'; 'Wendy Caruthers'

Subject: Northeast Utilities Service Co. concurrence requests #34952, #35029, #35022, #35109

Concurrence requests for Northeast Utilities Service Co., #34952, #35029, #35022, #35109 denied for the following reasons:

1. "Dominion" is the electric producer and owner of the Millstone power plant(s) located in Waterford, Connecticut. Northeast Utilities Service Company (NU) is a distributor of electricity. The statement provided by NU as an attachment "NUSC Statement.pdf (93KB), Re: Item 50, Form 601" no longer applies since they no longer own or control Millstone power plant(s).
2. Since NU is not the producer of electricity at Millstone, it does not coordinate/exercise with Department of Emergency Management Homeland Security on a Federal, State or local level.
3. The Request for Rule Waiver, file "gek6o25l - 220 Rule Waiver Request V2", has statements such as "used to protect safety of life, health or property" and "work in hand with public safety individuals." Has NU had any meetings with State Agencies, the "Department of Public Safety" and/or "Department of Emergency Management Homeland Security" and/or Health Department as to the needs of Public Safety in Coordinating activities?
4. NU does not identify the availability of radios or equipment to be available for the "public safety community".
5. NU has not forwarded its request to the State Radio Interoperability Committee for Comments.
6. NU does not comment on how it currently coordinates restoration efforts with "public safety" personnel.
7. NU does not comment on how restoration efforts are currently coordinated with the State.
8. Loading does not reflect need for all requested frequencies. Public Safety loading of 1 VHF frequency per 50 users.
9. Public Safety VHF Spectrum in CT is fully saturated. 220 - 222 Band is the only VHF Spectrum available.
10. State Radio Interoperability is exploring the use of all spectrum in CT including 220MHz, 700MHz and 4.9GHz.

JZ