

**Before the
National Telecommunications and Information Administration
U.S. Department of Commerce**

In the Matter of

**Presidential Memorandum, Modernizing United
States Spectrum Policy and Establishing a
National Spectrum Strategy**

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December 20, 2023

COMMENTS BY NENA: THE 9-1-1 ASSOCIATION

1 NENA: The 9-1-1 Association represents over twenty one thousand 9-1-1 professionals
2 nationwide hereby submits this comment for the record:

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4 **I. National Public Spectrum Strategy Should Include Spectrum eligible for licensing through**
5 **the use of Auctions with revenues to support 9-1-1 public safety modernization.**

6 NENA applauds the administration for its dedication to modernizing the nations spectrum
7 strategy. Spectrum plays a vital role in wireless services and connectivity consumers want and demand.
8 Spectrum dependent services play a vital role in our economy and the safety of individuals and
9 communities. Spectrum has become central to our nation’s public safety infrastructure. Field responders
10 depend on uninterrupted radio communications to fulfill their duties in ensuring the public receives
11 emergency services in a timely manner. In 9-1-1 public safety services over 85% of 9-1-1 calls originate
12 on wireless devices.

13 NENA asks the administration to embrace a concept that has been formulated in Congress: Public
14 spectrum auctions should help pay for public safety communications. Specifically, the transition from last
15 century voice centric 9-1-1 systems to an information rich, data centric system that the public expects of
16 emergency communication centers. At the center of this push is the national deployment of Next

17 Generation 9-1-1 technology (NG9-1-1). Currently, NG9-1-1 deployment is haphazard across the country
18 and tribal lands, splitting the public into two camps – the haves and have nots - in regards to NG9-1-1
19 deployment. This inequity puts citizens lives needlessly at risk during an emergency where field
20 responders might arrive too late or without proper situational awareness. Without federal funding from
21 auction revenues, this gap will only widen especially in rural, tribal, and underserved areas. Without
22 federal finding to transition all 9-1-1 centers to NG9-1-1, communities and tribal lands will have to pay
23 for both legacy, voice-centric 9-1-1 systems while also paying for 21st century, data-rich 9-1-1 systems: A
24 cost many communities and tribal communities simply cannot afford.

25 NENA welcomes the opportunity to work with NTIA and the administration on spectrum matters
26 relating to public safety NG9-1-1 to ensure the safety of our communities across the United States.

27 NENA is honored to have the opportunity to contribute and be considered in this proceeding.

Respectfully submitted,



Jonathan Gilad
Director of Government Affairs
NENA: The 9-1-1 Association