

Comments Regarding an Opt-In/Out Decision on the Vermont State FirstNet Plan

Ron Kumetz

13 OCT 17

Hello and thank you for inviting me to share my thoughts regarding FirstNet. I am the 1st Assistant Chief of the Alburgh Fire Department and have been involved with the fire and EMS services for about 30 years. I represent the Vermont State Firefighters Association's approximately 4500 members on the Public Safety Broadband Network Commission. I am also a broadcast engineer and design equipment for radio and television stations. Most recently a large project to protect the 19 FM radio stations which share a master antenna system on the Empire State Building. I have worked in the communications and broadcast industries for 40 years.

My mother taught me that if I didn't have anything nice to say that I should say nothing at all. If I was to follow her advice, I would have nothing to share with you regarding FirstNet so instead I will keep this as short as possible by covering a few salient topics.

Discussion of ecosystems, security, hardening, etc are irrelevant if the coverage is not sufficient to convince first responders (many of which pay for their own wireless plans shared with their families) to switch from their current carrier. In most cases that carrier in Vermont is Verizon.

Secondary consideration for first responders will be the priority and pre-emption of first responder calls when the network is crowded however since Verizon has offered these features to first responders on their existing network it is unlikely that the bulk of first responders will be enticed to move to AT&T's catch-up network.

FirstNet claims to be a partnership with the states to develop a robust broadband network for first responders. The reality is quite different. Starting with the onerous terms of use for the state plan portal FirstNet and AT&T have demonstrated a level of secrecy and mistrust which defy the definition of a partnership. The state plan portal contained so little information and the information that it did contain was of such dubious accuracy that the PSBNC had no choice but to issue an RFP to see what other options might present themselves.

Items as basic as coverage are provided in such minimal and subjective detail as to resemble the AT&T consumer website more than a professional partnership plan for a multi-million dollar state network. AT&T claims that the signal level which represents "coverage" to be proprietary. In the land mobile industry, coverage maps are generated with actual signal levels to allow the reader to make reasonable and intuitive conclusions. For example: If I have good coverage in one area of the map which is yellow then I can assume that any other area which is yellow will also have good coverage. AT&T's map, like those on consumer wireless websites and literature simply shows "coverage". PSBNC members applied tribal knowledge to quickly determine that AT&T's coverage was overstated based on our experience in areas represented as in network which have poor or no actual coverage at this time.

In another act of questionable faith, AT&T commissioned a drive test of multiple carriers in Vermont but excluded VTel from those tests indicating that they are not willing to partner with all carriers to achieve the best possible coverage.

I recently read an editorial in a communications industry journal which asserted that AT&T has

no choice but to deliver the goods for FirstNet since it is such a high profile project that failure would irreparably tarnish their image. I responded to the writer that her conclusion was quite incorrect. Because FirstNet has inked a contract with AT&T which covers their own backs by keeping it a secret, none of us will ever be able to prove that they have NOT delivered according to their contractual obligations. Both FirstNet and AT&T have plausible deniability.

The most significant reason for Vermont to be cautious about making an opt-in decision is the amount of effort which FirstNet has applied to intimidating us into believing that an opt-out decision would be disastrous and costly. Rather than providing guidance to states to make an opt-out decision a viable alternative which might provide the best network possible they have made it clear that states opting out are not only on their own but they must jump through a plethora of flaming hoops to have their RAN comply with FirstNet's unreasonable demands and are subject to significant penalties if they do not. Due to the secrecy of the AT&T contract it is unclear whether or not AT&T is subject to the same conditions.

My general philosophy is to walk away from any transaction where the other party appears to be avoiding transparency. In this case, not only are FirstNet and AT&T being less than transparent, they have adopted a threatening tone. The simplest analogy I can make is the cliché image of two well dressed men with shiny shoes pulling up in a Cadillac, opening the door and saying “get in”. We ask “why” and they say “because not getting in would be unhealthy for you”.

My assessment of the current situation as the representative for approximately 5000 volunteer firefighters in Vermont is that Governor Scott has no choice but to opt-out to buy us time to evaluate the alternatives submitted to our RFP process and determine how we would manage a state RAN. While FirstNet maintains that the sole purpose of this network is for first responders, we as frugal yankees should be assessing the trickle down impact that FirstNet dollars might have in improving broadband capabilities for all Vermonters and leveraging those benefits rather than wasting the opportunity. Furthermore, our congressional delegation should be asking very hard questions within the beltway in an attempt to convince FirstNet and AT&T to abandon their top secret shell game and to re-approach the table as legitimate partners attempting to build the best possible broadband network.

Contact Information:

Ron Kumetz

(802) 796-6031

ron@broadcast-devices.com