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September 30, 2019

VIA ELECTRONIC FILING

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Improving Competitive Broadband Access to Multiple Tenant Environments*
(GN Docket 17-142)

Dear Ms. Dortch:

The Industry Council for Emergency Response Technologies (“iCERT” or “Industry Council”)¹ respectfully submits the following Reply in response to the Notice of Proposed Rulemaking and Declaratory Ruling released by the Federal Communications Commission (“FCC” or “Commission”) on July 12, 2019² in connection with the above-referenced docket. iCERT appreciates this opportunity to provide feedback to the Commission.

iCERT recognizes the importance of promoting broadband competition and addressing the issues that may be unique to facilitating competitive broadband access in multiple tenant environments (MTEs). While this proceeding does not mention public safety, nevertheless, we agree with T-Mobile,³ the Government Wireless Technology and Telecommunications Association (“GWTTA”),⁴ and the Safer Building Coalition (“SBC”)⁵ that the challenges applicable to MTEs raise important public safety issues. iCERT’s comments are focused solely on those issues.

¹ iCERT is a technology trade association whose members include a diverse group of commercial public safety technology providers, wireless carriers, manufacturers, software vendors, system integrators, IoT technologists, and related vendors who share common concerns on public policy issues impacting the nation’s emergency response sector. *More information at:* <http://www.theindustrycouncil.org/>

² *In the Matter of Improving Competitive Broadband Access to Multiple Tenant Environments*, GN Docket No. 17-142, Notice of Proposed Rulemaking and Declaratory Ruling, (FCC 19-65) (Adopted: July 10, 2019 Released: July 12, 2019) (“NPRM”).

³ *Comments of T-Mobile USA, Inc.*, (filed August 30, 2019), *In the Matter of Improving Competitive Broadband Access to Multiple Tenant Environments*, GN Docket No. 17-142

⁴ *Comments of the Government Wireless Technology and Communications Association*, (filed August 30, 2019), *In the Matter of Improving Competitive Broadband Access to Multiple Tenant Environments*, GN Docket No. 17-142

⁵ *Comments of the Safer Building Coalition*, (filed August 30, 2019), *In the Matter of Improving Competitive Broadband Access to Multiple Tenant Environments*, GN Docket No. 17-142

As T-Mobile, GWTTA, and SBC each noted, wireless communications inside buildings is vital to public safety. It is vital to ensuring that someone in distress can make a 911 call, vital to ensuring that the general public receives timely alerts about emergencies in the area, and vital to ensuring that first responders can communicate effectively when responding to emergencies. Put simply, the ability to communicate effectively inside buildings is critical to both citizens and first responders and a failure to communicate effectively could ultimately mean a loss of life.

As the NPRM notes, wireless communications inside buildings is often supported through distributed antenna systems (“DAS”), which connect to commercial wireless networks and help to expand the coverage and capacity of such networks for use by customers wishing to communicate inside the building. These customers include first responders. DAS is also increasingly being used to support land mobile radio (“LMR”) systems owned and operated by public safety agencies.

Promoting shared access to DAS facilities for all 4G, 5G, and LMR networks will promote public safety by helping to ensure that citizens and first responders alike, regardless of which networks they use, can communicate effectively inside buildings. iCERT urges the FCC to consider these important public safety issues in this proceeding and ensure that any actions it takes both encourages further investment in DAS and helps to facilitate shared access to DAS locations.

We appreciate the opportunity to express our views on these important issues and offer our time and expertise in the event the Commission has any questions on how this proceeding might impact public safety.

Respectfully submitted,

/s/ Kim Robert Scovill

Kim Robert Scovill, Esq.
Executive Director