

**Before the
Federal Communications Commission
Washington, DC 20554**

In the matter of)
)
Amendment of Part 97 of the Commission's Rules) WP Docket No. 10-72
Regarding Amateur Radio Service)
Communications During Government Disaster)
Drills)

To: The Commission

**Comments of April Moell
Amateur Radio WA6OPS**

I am the founder and leader of the Hospital Disaster Support Communications System (HDSCS) of Orange County, California. HDSCS is an organization of local Amateur Radio Operators and is part of the Amateur Radio Emergency Service (ARES) of the American Radio Relay League (ARRL). I have a medical background and served as the head of a patient care department in a 300-bed hospital for 17 years.

Since 1980, HDSCS has provided emergency medical communications for the 35 hospitals of our county when normal systems have failed or become overloaded. Our group has activated over 100 times during actual communications failures, including both large disasters (earthquakes, wildfires, floods) and smaller ones (switchboard failures, cables cut by backhoes, power outages). In these communications failures, we have sent and received numerous medical messages to facilitate patient care, both within the hospitals (unit-to-unit) as well as between the hospitals and outside resources.

All HDSCS members are volunteers who agree to serve all hospitals equally. They have a wide variety of occupations. Only a small fraction of our members are employed by hospitals or other health care organizations. HDSCS has received recognition by and commendations from the Federal Emergency Management Agency (FEMA), National Disaster Medical System (NDMS), our county's Emergency Management Agency and Board of Supervisors, as well as numerous elected state and federal legislators.

Time and again, HDSCS has demonstrated the importance of a well-trained cadre of community volunteer "ham" operators that can go into any of our supported hospitals to assist the medical staff with communications when their regular systems fail. By being dedicated communicators, our volunteers free up the staff members to perform their important medical duties which might otherwise have to be interrupted or suspended to deal with the communications problems.

In the summer of 2009, FCC staff members issued a very narrow interpretation of rule 97.113(a)(3) that specifically forbids employees of hospitals and other agencies from participating in emergency preparedness drills of their employers on Amateur Radio frequencies, despite the fact that such communications are for the ultimate benefit of the general public (e.g. hospitalized patients), not for the business purposes of the hospitals or agencies. This interpretation was not a hindrance to the community volunteers who make up nearly all of the membership of HDSCS. Nevertheless, a few of our members were affected, and we recognize that Amateur Radio licenses who are hospital employees nationwide need to be able to receive on-the-air training along with the volunteer Amateur Radio operators in their community.

Employees with Amateur Radio licenses have an important role to play in organizing local ham radio volunteers, training them in medical messaging, setting up alerting plans to bring them in when needed, orienting them to the hospital environment, and so forth. These licensed employees should not be forbidden from participating on Amateur Radio frequencies with the volunteers in drills and tests. The same applies to licensed employees of other non-government entities and of governments -- they need to be part of the drills and tests of Amateur Radio equipment and communications skills. They must become thoroughly familiar with Amateur radio equipment and communications procedures, as well as with the Amateur Radio networks in their community that will connect them with the resources they will need in disasters.

At a large Amateur Radio convention in Dayton, Ohio last year, FCC's Senior Emergency Manager spoke to the attendees about the Amateur Radio Service role in disasters. Referring to the oft-heard slogan, "Amateur Radio -- When All Else Fails," he correctly stated: "If there is no pre-familiarization, no pre-planning and no training, then Amateur Radio will fail, too, and citizens and property will be more at risk."¹

Therefore, HDSCS supports FCC's proposed addition of paragraph 97.113(a)(3)(i), except that "government-sponsored" should be removed from the proposed wording. In its public notice, FCC gave no rationale for this limitation other than it would ensure that drills further public safety. However, hospitals and other non-government agencies often have important drills and exercises without government sponsorship or participation. The volunteer Amateur Radio operators of HDSCS have participated in numerous such drills, all of which have served the public interest. There is no good reason why licensed employees should not get important on-the-air training in these non-government drills and exercises.

Volunteer Amateur Radio operators in most localities have established their own emergency communications (emcomm) organizations such as ARES and RACES. Some commenters in this proceeding have expressed concern that the proposed rules change would result in these groups and their members being "shut out" of the Amateur Radio communications plans of hospitals and other agencies, both government and non-government. I believe that this will not happen as long as local emcomm groups continue to forge strong ties with their supported agencies and continue to provide them with community volunteers who are well equipped, trained and eager to serve. In that regard, these emcomm groups are in charge of their own destinies.

In my response to the American Hospital Association's request in FCC Docket 10-54, I cautioned that hospital emergency planners should not base their Amateur Radio backup communications support solely on licensed hospital employees. The same is true for other non-government entities, as well as governments at all levels. For many practical reasons, which are described in detail within our organization's Web site, the most effective and enduring support requires, in addition to any licensed employees, a well organized and trained cadre of volunteer ham radio operators in the surrounding community who can serve as dedicated communicators when normal systems fail.

Respectfully submitted,

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¹ Curt Bartholomew, Senior Emergency Manager, Public Safety and Homeland Security Bureau. Presentation available for download at <<http://www.fcc.gov/pshs/docs/speeches/Curt-Bartholomew-05-17-09.pdf>>