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UNITED STATES OF AMERICA

DOCKETED
DATE

NUCLEAR REGULATORY COMMISSION

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COMMISSIONERS:

Nunzio J. Palladino, Chairman
Victor Gilinsky
Thomas M. Roberts
James K. Asselstine
Frederick M. Bernthal

OFFICE OF SECRETARY
DOCKETING & SERVICE
BRANCH

In the Matter of)
)
CONSOLIDATED EDISON COMPANY OF NEW YORK)
)
 (Indian Point, Unit 2))
)
)
POWER AUTHORITY OF THE STATE OF NEW YORK)
)
 (Indian Point, Unit 3))
)

Docket Nos. 50-247 SP
50-286 SP

April 1, 1984

ADDITIONAL ATTACHMENT TO
FEBRUARY 4, 1984
COMMENTS ON
ATOMIC SAFETY AND LICENSING BOARD
RECOMMENDATIONS TO THE COMMISSION
REGARDING INDIAN POINT

On February 4, 1984 Intervenors, joined by the County of Rockland and Members of the Council of the City of New York submitted Comments on Atomic Safety and Licensing Board Recommendations to the Commission Regarding Indian Point (Comments). On page 18 of our Comments, under the heading "Training, equipment, and personnel," we state:

"Transportation, communication, dosimetry, and other protective equipment remains grossly inadequate."
(emphasis added for the purpose of this submission only)

After that sentence we wish to add "See Attachment G" which we are submitting herewith.

On February 22, 1984 the Office of the Lieutenant Governor of the State

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of New York conducted the first of three public hearings on "Deficiencies in Emergency Communications Systems Used By Public Safety and Police Agencies." The presiding officer of the hearing was Lieutenant Governor Alfred B. DelBello; Frank Petrone, Director, Region II, FEMA, presented an opening statement.

The enclosed testimony of Westchester and Rockland officials, copies of which are submitted herewith as "Attachment G" to our Comments, serves to document the point that "communication...remains grossly inadequate.*

The Commission may prefer to consider this material as support for the Board's findings that

With respect to communications with support personnel and facilities, however, we cannot find that this planning standard has been met. ...The record does not demonstrate that this communication capacity is adequate

--ASLB Recommendations, p. 192

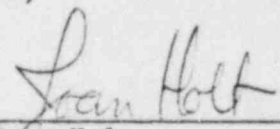
We would point out, however, that the Board's conclusion that the record is inconclusive on this matter provides a striking example of what Intervenors had in mind when we stated, on page 2 of our Comments, that "On a number of crucial issues, the Board failed to arrive at conclusions which logically followed from its own findings of fact."

NYPIRG submits that a careful reading of the testimony in "Attachment G" by the Commissioners must persuade them that the capability of vital emergency services in Westchester and Rockland to facilitate implementation of protective measures in the event of an accident at Indian Point is woefully lacking.

dated: April 1, 1984

3 years past NRC deadline for
implementing emergency plans
adequate to assure that public
health and safety can be protected

Respectfully submitted,


Joan Holt
Project Director, NYPIRG

* "Transportation...remains grossly inadequate" as well; new transportation plans for Westchester and Rockland have not been completed and, like everything else connected with Indian Point, promised dates keep slipping.



STATE OF NEW YORK
OFFICE OF THE LIEUTENANT GOVERNOR
ALBANY 12224

Alfred B. DelBello
Lieutenant Governor

PRESS ADVISORY

Contact: 212-488-7900

SUBJECT: DEFICIENCIES IN EMERGENCY COMMUNICATIONS SYSTEMS
USED BY PUBLIC SAFETY AND POLICE AGENCIES

EVENT: PUBLIC HEARINGS

DATE/TIME: WEDNESDAY, FEBRUARY 22, 1984 10:00 a.m.

LOCATION: 2 WORLD TRADE CENTER, 62nd Floor, Room 6218

The ability of public safety forces to respond rapidly and effectively to emergencies (from fires to floods to toxic spills to accidents at a nuclear power plant) is dependent on reliable radio and telephone communication systems.

Alarming examples of potentially life threatening breakdowns in communication systems during emergency conditions have been reported by public officials across New York State.

These problems are tied to communication systems which have been described as "antiquated, unreliable and inadequate for emergency operations."

Governor Mario Cuomo has asked Lieutenant Governor Alfred DelBello to look into the emergency communications problems in New York, and recommend an action plan to address these problems.

The first of these public hearings chaired by Lieutenant Governor Alfred DelBello will be held in New York City, February 22. Further hearings will be held in Buffalo and Albany.

Federal, State and local officials, as well as communications experts will testify regarding:

- 1) --Dangers inherent in the current system of emergency communications.
- 2) --Actual instances of communications breakdowns during responses to emergency situations.
- 3) --Extraordinary communications needs to deal with special emergency conditions such as accidents at nuclear power plants and major toxic spills.
- 4) --The need for a state-wide Master Plan for emergency communications.
- 5) --Approaches to upgrading the present communications systems, including new technologies, and possible joint ventures with adjacent states and the Federal government.
- 6) --Communications needs to the year 2000 and beyond.

WESTCHESTER COUNTY
CHIEFS OF POLICE ASSOCIATION, INC.

President: James W. Mondelli

Charles McLaughlin Secretary:

February 22, 1984

Honorable Alfred B. Del Bello
Lieutenant Governor
State of New York

Dear Lieutenant Governor:

As President of better than forty (40) Police Chiefs and Commissioners who comprise the Westchester County Chiefs of Police Association, Inc., I am here to bring to your attention a matter of grave concern to us concerning the safety of our almost 900,000 residents.

Specifically, and to the point, we feel that the State has not properly evaluated the present capability of the communities surrounding the nuclear plants at Indian Point, Buchanan, New York, to safely handle an emergency, at said location, which might require a large scale evacuation.

The communications equipment being utilized by the Police agencies who would have to coordinate such an evacuation do not presently permit inter-agency communication, on a common channel. Simply, stated if the phone system goes down, as well it might in such an emergency, we, the Police of this County will be unable to communicate with each other. More on this subject later.

Coordinating the massive movement of vehicles over an inadequate road system is a complex task under the best of circumstances. To attempt it without the benefit of up to the minute information, and with agencies operating at what would undoubtedly be cross purposes to one another, is sheer madness. Yet the state, charged with the responsibility of evaluating the capability of the surrounding communities to deal with an Indian Point Emergency at the annual drills held in March of 1982 and 1983, failed to even mention this gross inadequacy! Obviously, our ability to obtain the necessary equipment to do this vital task is severely undercut, when a federal evaluating agency's report suggests that "ALL IS WELL."

WESTCHESTER COUNTY
CHIEFS OF POLICE ASSOCIATION, INC.

President:

-2-

Secretary:

Since we expect another drill in the near future, we urge you to carefully review the state's posture in this vital matter. Our citizens are entitled to have the benefit of an accurate appraisal of the capability of their emergency management structures if they are to be able to take the necessary steps, through the available governmental processes, to insure or at least maximize their health and safety.

Please understand that we, the Chiefs of Police, have cooperated fully, despite our serious misgivings about the lack of training and equipment, in an effort to develop adequate emergency plans. Our cooperation should not be interpreted as an approval of the gross inadequacies which we have consistently pointed out to members of the state. Misleading reports create an illusion of preparedness which risks the lives of our citizens. We urge your personal attention to correct this situation; and we stand ready to assist you in any appropriate way in furtherance of the safety of the public.

In closing, I wish to thank you, Lieutenant Governor DelBello, for your interest in this matter and at this time I would like to turn over the rest of my time to Chief Richard Spota, who is the 1st Vice President of our association and is Chairman of the Telecommunications committee.

I wish to thank you for giving me the opportunity to speak on this vital matter.

James D. Mondelli
President



Andrew P. O'Rourke
County Executive

WESTCHESTER COUNTY
DEPARTMENT OF
PUBLIC SAFETY

DANIEL P. GUIDO
Commissioner / Sheriff

Statement of:
Deputy Comr. Thomas J. Sweeney
Westchester County Department
of Public Safety
February 22, 1984

This morning I appear on behalf of Hon. Andrew F. O'Rourke, County Executive of Westchester County, to address a matter of great concern to our law enforcement community. The fact that police communications in the County are woefully inadequate to handle a major emergency is not a new revelation. The substance of my remarks has been the subject of earlier testimony before the Nuclear Regulatory Commission. The purpose here is to underscore the seriousness of this problem, and to again urge New York State to follow through with the necessary remedies to correct this condition.

Westchester County's make-up and geographic location presents significant potential for a serious disaster situation. The County, particularly its southern tier, is densely populated. Through this area numerous rail lines converge as they enter New York City. The County's interstate system is very heavily trafficked by trucks, many of which carry materials hazardous to the public. The flight paths of airplanes arriving and departing the metropolitan area and airports cross directly

Statement of:
Thomas J. Sweeney
Deputy Commissioner
Westchester County Department
of Public Safety
February 22, 1984

over the County. Were these factors alone not sufficient to highlight the potential for a serious emergency to occur, the County is also the home of the Indian Point nuclear facility. That plant, the closest in the nation to such a heavily populated area, has as you are well aware, been the subject of much discussion concerning the preparedness of surrounding communities to handle a radiological emergency.

Forty-two separate police jurisdictions make up the County. Primary responsibility for response to an emergency would rest with one of those separate police agencies. Most are twenty (20) to forty (40) man police departments which, by their size alone, are not sufficient to cope with a major emergency condition. The limited manning of the individual police agencies and the close proximity of jurisdictions, mandates a cross-jurisdictional response to such events. Except in rare cases, the responding police personnel from separate municipalities have no communications capabilities to talk with one another and to coordinate their actions. The absence of adequate communications equipment which would permit such cross-jurisdictional coordination effectively undercuts all efforts to establish coordinated multi-jurisdictional responses to emergency situations.

In event of a radiological emergency, the County assumes primary responsibility to coordinate the response of emergency services.

Statement of:
Thomas J. Sweeney
Deputy Commissioner
Westchester County Department
of Public Safety
February 22, 1984

The Department of Public Safety in conjunction with police agencies in the ten (10) mile area around Indian Point, has established plans to monitor traffic conditions, to facilitate the flow of emergency equipment and private vehicles on main arteries, and to restrict public access to areas in event sheltering or evacuation is ordered. Even in the immediate area of Indian Point, Westchester police agencies lack the communication equipment and capabilities to meet their responsibilities in a radiological emergency. Police vehicles responding to such an event cannot give information, nor receive directions directly from a central communications point. Information must be relayed through their individual headquarters and then transmitted by their dispatchers to the County Police Headquarters. This process greatly slows the speed at which vital communications information can flow and is subject to serious disruption in event of the failure of the phone system during such an emergency. To echo the sentiments of the President of the Westchester County Chiefs of Police Association, Chief James Mondelli, let me state that coordinating the massive movement of emergency equipment and vehicles over an inadequate road system is, at best, a difficult endeavor. To attempt such movement without up-to-date information with police personnel whose actions cannot be coordinated on a common channel and, therefore, may be working at cross purposes with one another, is sheer madness.

Statement of:
Thomas J. Sweeney
Deputy Commissioner
of the Department of
Public Safety
February 22, 1984

In 1968, New York State recognized the inadequacies of police communications to effectively coordinate a response to emergency situations. The State commissioned planning for a law enforcement radio system which would correct this serious deficiency by providing multi-channel capabilities to all police agencies, including a common channel that could be used during emergency situations. In 1970, the Mobile Radio District (MRD) program was formulated. Since that time \$20,000,000 federal dollars and \$4,000,000 in state funds have been utilized to accomplish a phased implementation of that program. At the current time while 80% of the MRD program has been completed state-wide, only 36% of the police agencies (15 of 42) in Westchester, have been brought into the program.

The MRD schedule for implementation called for four more years of funding to complete the program efforts. Recognizing that the established schedules for implementation did not adequately reflect the gravity of the communications problem in the immediate area of Indian Point, County Executive Andrew P. O'Rourke requested on December 6, 1983, that the funding for MRD Westchester Group #3 which includes seven municipalities within the ten mile radius of Indian Point, be accelerated from its projected place in the 1985-86 state budget for implementation in 1984 and 1985. In recent weeks we have been shocked to learn that all funding for MRD implementation has been stricken from the Governor's proposed budget.

Statement of:
Thomas J. Sweeney
Deputy Commissioner
of the Department of
Public Safety
February 22, 1984

I have stressed the point that the population density, geographic location, and patterns of commerce in Westchester County all contribute to the potential for serious emergency situations. These risks are compounded greatly by the presence of a nuclear facility for which the County carries the responsibility to maintain a level of emergency preparedness. By deleting the funds for MRD implementation in the 1984-85 budget, New York State has not only turned its back on the general need for a police emergency communications capability in Westchester County, it has specifically ignored the concerns voiced by the County Executive and the Chiefs of Police regarding the safety of persons in and about the Indian Point nuclear facility. In light of the glaring need to complete the MRD program in Westchester County so that all of our police agencies have a common channel for emergency communications, we strongly urge that the state government restore to the 1984-85 budget those funds necessary for the scheduled implementation of MRD. In addition, because of the serious need for communications in event of a radiological emergency, we request that an additional \$537,000 be added to the 1984-85 budget to accelerate the implementation for MRD Westchester Group #3 which lies in the immediate vicinity of Indian Point.



TELEPHONE
(914) 631-0800



RICHARD J. SPOTA
Chief of Police

Police Department

Village of North Tarrytown, N. Y. 10591

I come before you today as the Southern Region Representative of the New York Statewide Law Enforcement Telecommunications Committee (NYSLETC) for the New York State Association of Chiefs of Police Inc., and the First Vice President and Chairman of the M.R.D. Committee for the Westchester County Chiefs of Police Association, Inc.

Due to the demise of L.E.A.A. funding several years ago there are parts of Westchester County that have yet to come into the 20th Century as far as Radio Communications are concerned. Specifically M.R.D. Group #2, which includes the Towns of New Castle, North Castle, Bedford and the Village of Mount Kisco which was scheduled to be funded this year by the State, and M.R.D. Group #3 which are the Towns of Ossining and Mt. Pleasant, the Villages of Croton, Ossining, Briarcliff Manor, North Tarrytown and Pleasantville can not Communicate via the Police Radio with the rest of the County.

Almost all of M.R.D. Group #3 are within the ten mile radius of the Nuclear Plants at Indian Point, Buchanan, New York.

Although we the Chiefs of Police in this Area of Westchester County co-operated in the Indian Point Emergency Drills, in reality, there can be no evacuation of the Area unless we have the Radio Equipment to communicate with each other.

At this point Gov. Cuomo's proposed budget currently includes no funding whatever for the M.R.D. Program.

To complete the M.R.D. Program \$315,544.00 is needed for Group #2 and \$537,821.00 for Group #3 for a total of \$853,365.00.



TELEPHONE
(914) 631-0800



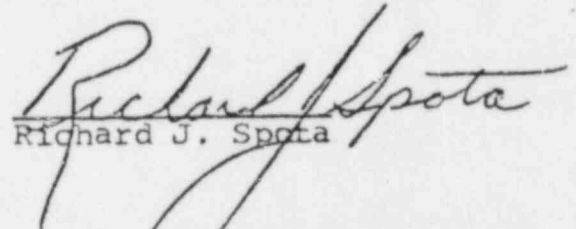
RICHARD J. SPOTA
Chief of Police

Police Department

Village of North Tarrytown, N. Y. 10591

It is imperative that these M.R.D. funds be added to the State Budget appropriations before the 1984-85 Budget is adopted by the Legislature.

Indian Point is only one of many emergency situations that could have disastrous effects on Westchester County if we do not move forward to rectify the critical situation immediately.



Richard J. Spota

N.Y.S.L.E.T.C. Rep.
Southern Region of N.Y.
1st V.P. & Chairman M.R.D.
Committee, Westchester Co.
Chiefs of Police Association, Inc

STATEMENT TO BE DELIVERED BEFORE THE OFFICE OF LT. GOVERNOR
February 22, 1984, 10 a.m.
New York City--2 World Trade Center, 62nd Floor, Room 6218

My name is Richard F. Herbek, and I am the Village Manager of the Village of Croton on Hudson. I would like to offer the following with respect to the subject of emergency communications at the local level of government.

At the present time, our Village's emergency communications system is antiquated and inadequate to meet the Village's, County's, or State's needs for a reliable and efficient system. The base station is 20 years old, mobile radios are 10 years old, and portables are 7 to 10 years old. Repairs to keep the system functioning are necessary on a day-to-day basis. The cost of modernizing our emergency communications system is beyond the means of our relatively small Village of 6,800 people with a very limited tax base.

We have no radio communications with the New York State Police, Westchester County Police, and the surrounding police departments of Peekskill, Buchanan, and Yorktown.

Presently, the only communications link with other communities is by telephone and the Westchester County Hot Line. Telephone communications have proven to be extremely unreliable, especially during crisis periods like hurricanes, snow storms, floods and other types of disasters. Our one desk officer must primarily rely on the hot line as the only means of communication with other jurisdictions. If the Hot Line fails, there is no communication with anyone.

I must speak particularly about the Radiological Emergency Response Plan for the Indian Pt. nuclear reactors. One of the most vital components

of the plan is emergency communications. Our Village is within the ten mile radius of Indian Pt. and, at the moment, is seriously handicapped in performing emergency service functions as part of that plan because of our inadequate communications system.

Rts. 9 and 9A are the only southbound routes of exit from our Village. In order to get to either of these routes you must cross over the Croton River on one bridge. Problems with the bridge or with Rts. 9 and 9A can spell disaster for anyone headed southbound. In fact, early morning traffic routinely backs up over the bridge to the Croton Pt. exit ramp on many mornings. Can you picture an evacuation from the ten-mile radius with traffic unable to move and no communications between Police Departments?

I understand that the ^(funding) ~~two hundred thousand~~ ^{\$ 537,821} ~~(\$200,000.)~~ dollars projected for Westchester MRD #3 is planned for the 1985-86 New York State budget. On behalf of the 6,800 residents of the Village of Croton on Hudson, and all residents within the ten-mile radius of Indian Pt., I would like to take this opportunity to urge that your office prevail upon the Governor and State Legislature to advance this funding to the 1984-85 budget.

"Westchester 3" consists of the police departments of the Villages of Croton on Hudson, Ossining, Briarcliff Manor, and North Tarrytown and of the Towns of Ossining and Mt. Pleasant. Of this area, only North Tarrytown lies outside the ten-mile radius.

Without this funding and modernization of our Emergency Communications Systems, the Radiological Emergency Response Plan cannot work, and our citizens are in jeopardy if a major disaster develops.

STATEMENT OF CHIEF STEPHEN G. SCURTI, STONY POINT
POLICE DEPARTMENT, AT A PUBLIC HEARING ON EMERGENCY
COMMUNICATIONS IN NEW YORK STATE, ON FEBRUARY 22, 1984
IN NEW YORK CITY.

I FIND IT DIFFICULT TO ADDRESS THE ISSUE OF EMERGENCY COMMUNICATIONS OR MORE SPECIFICALLY, POLICE COMMUNICATIONS, WITHOUT REFERRING TO "THE NEW YORK STATE PLAN FOR IMPROVING THE EFFECTIVENESS OF POLICE COMMUNICATIONS", (REVISED IN 1971). THIS PLAN OUTLINES IN DETAIL THE STEPS THAT NEED TO BE TAKEN FOR THE INCREASED EFFECTIVENESS AND COORDINATION OF POLICE RADIO COMMUNICATIONS OPERATIONS. THE PLAN COMBINES SUCH ORGANIZATIONAL AND OPERATIONAL CONSIDERATIONS AS TELEPHONE COMPANY BOUNDARIES, JURISDICTIONAL BOUNDARIES AND PATROL PATTERNS, AS WELL AS MANY TECHNOLOGICAL CONSIDERATIONS IN PROPOSING FUNCTIONAL CONFIGURATIONS OF POLICE RADIO SYSTEMS CALLED MOBILE RADIO DISTRICTS (MRD).

IN EACH MRD, LOCAL POLICE AGENCIES CAN SHARE A COMMON FREQUENCY OR FREQUENCIES AND HAVE MULTIPLE CHANNEL CAPACITY PERMITTING COORDINATION WITH THE STATE POLICE AND SHERIFF'S DEPARTMENT IN THE EVENT OF AN EMERGENCY OR LOCAL DISASTER.

THE POLICE AGENCIES IN THE AREA OF THE INDIAN POINT NUCLEAR PLANTS HAVE REPEATEDLY TAKEN THE POSITION THAT NO EVACUATION IS FEASIBLE WITHOUT ADEQUATE POLICE AND EMERGENCY COMMUNICATIONS.

THE BREAKDOWN IN POLICE RADIO COMMUNICATIONS NETWORKS OFTEN OCCURS IN MAJOR DISORDERS DEMANDING THE COORDINATED ACTION OF A NUMBER OF POLICE AGENCIES. IN SUCH CASES THE CONGESTION, LACK OF FLEXIBILITY AND FREQUENCY INCOMPATIBILITY PREVENT ANY POSSIBILITY OF A COHESIVE COORDINATED FORCE.

FURTHERMORE, IN THE EVENT OF A DISASTER, STANDARD OPERATING FREQUENCIES MUST NOT BE EXPECTED TO CARRY COMMUNICATIONS FOR THE DISASTER. THEY MUST BE LEFT OPEN TO SUPPORT NORMAL OPERATIONS.

UNDER AN MRD, THE IMPLEMENTATION OF A UNIFORM STATEWIDE EMERGENCY FREQUENCY WOULD DIRECT COMMUNICATION WITH ALL ELEMENTS WORKING TOGETHER IN AN EMERGENCY SITUATION. THIS WOULD PERMIT BYPASSING HEAVY OPERATIONAL TRAFFIC LOADS AND ELIMINATE THE NECESSITY FOR HAVING MESSAGES RELAYED THROUGH A DISPATCHER. ALL UNITS TUNED TO THE EMERGENCY CHANNEL COULD COMMUNICATE DIRECTLY WITH ONE ANOTHER, WITH A MAIN COMMAND POST, OR ANY SUPPORT SERVICE MONITORING THE TACTICAL FREQUENCY.

EFFECTIVE COMMAND AND CONTROL OF POLICE RESOURCES DEPEND UPON EFFECTIVE COMMUNICATIONS, PLANNING AND EQUIPMENT. FEW POLICE AGENCIES HAVE ADEQUATE COMMUNICATIONS, EQUIPMENT OR FREQUENCIES. PRESENT EQUIPMENT IS, IN MANY CASES, OUTMODED OR LIMITED IN RANGE OR FREQUENCY SELECTION.

COMMUNICATIONS EQUIPMENT POSSESSING FREQUENCY COMPATIBILITY IS NEEDED TO FACILITATE THE TRANSFORMATION OF MULTIPLE POLICE AGENCIES INTO A COORDINATED UNIT.

THE STATE PLAN WAS FIRMLY ESTABLISHED IN 1971. THE BUILDING OF AN EFFECTIVE AND INTEGRATED POLICE COMMUNICATIONS NETWORK THROUGHOUT THE STATE WAS STARTED BUT NEVER COMPLETED. THE STATE OF NEW YORK HAS SPONSORED A TOTAL MRD SYSTEM OF RADIO COMMUNICATIONS SPENDING OVER \$26,000,000 STATEWIDE.

THROUGHOUT THE STATE, LOCAL GOVERNMENTS HAVE MANIFESTED THEIR SUPPORT BY PASSING APPROPRIATE RESOLUTIONS IN SUPPORT OF MRD'S, PETITIONS HAVE BEEN FILED AND LETTERS HAVE BEEN SENT. LOCAL POLICE AGENCIES HAVE REPEATEDLY COMPLETED SURVEYS REGARDING RADIO COMMUNICATIONS AND THE NEED FOR IMPROVEMENT HAS FREQUENTLY BEEN ESTABLISHED.

THOSE AGENCIES THAT HAVE NOT BEEN FUNDED HAVE ONE COMMON CHARACTERISTIC, FRUSTRATION, FRUSTRATION WITH THE YEARS OF PROMISES, MEETINGS, DIALOGS AND RHETORIC SURROUNDING MRD!

FINALLY, WE ONLY ASK FOR EQUAL TREATMENT AND CONSIDERATION AS THOSE WHO HAVE MRD'S IN PLACE HAVE ENJOYED. I HOPE THAT THESE HEARINGS WILL PROVIDE THE NECESSARY IMPETUS TO RELEASE THE FUNDS FOR THE COMPLETION OF AN EFFECTIVE STATEWIDE PLAN.

THANK YOU

Ossining Volunteer Ambulance Corps, Inc.

P. O. Box 523

Ossining, New York 10562

EMERGENCY COMMUNICATIONS IN NEW YORK STATE
PUBLIC HEARING, FEBRUARY 22, 1984

The Ossining Volunteer Ambulance Corps, Inc. faces two major problems in its endeavor to provide Emergency Medical Services to the Ossining community (Westchester County, New York).

1. Co-channel interference from New Jersey
2. Poor inter-agency radio compatability

Since we are located in close proximity to New Jersey, we encounter a disproportionate amount of interference from agencies in New Jersey, specifically the Regional Emergency Medical Services of Newark, New Jersey.

We presently share a frequency of 155.400 mhz with this agency. In New York State, this frequency is used for ambulance to hospital communications. In Newark, it is used as the primary dispatch frequency for that area. It appears that the Newark network uses a tone squelch system and does not monitor the frequency before transmitting. This causes interruption of our radio signal, even if we are transmitting within a few miles of our base hospital.

The quality of ambulance service would be improved if there were designated frequencies that would reduce, or at least keep to a minimum, the amount of co-channel interference.

Unfortunately, the present system of radio communications in our area does not allow for adequate communications between emergency medical, fire, police, and other emergency service agencies. The problems in this regard fall into two categories:

1. When we operate in conjunction with other ambulance agencies, we share a common radio frequency with them. It is customary for the physical range limitations of the radio system to impair our ability to adequately communicate with other ambulances.

2. When we are engaged in operations with police, fire and other emergency service agencies we encounter the majority of our problems. We are seriously limited in our ability to communicate directly with other agencies when we are involved in an interagency emergency. Presently, there is no way for us

Ossining Volunteer Ambulance Corps, Inc.

P. O. Box 523

Ossining, New York 10562

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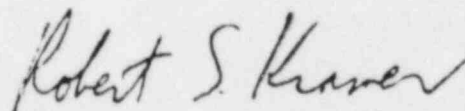
to communicate directly with any agencies other than the Police Department in our own Town and the departments in three adjacent towns.

For example, although we are within the 10-mile zone of the Indian Point Nuclear Power Plant, we have no way of communicating with the police departments providing service to the area surrounding the plant and along the evacuation routes from the plant.

Regardless of the location of an inter-agency emergency, we are unable to directly communicate with local police departments, fire departments, Civil Defense officials or the Westchester County Department of Public Safety. It is true that an Emergency Medical Services base radio has been activated at the Westchester County Fire Training Center, but this station cannot provide reliable communications with all agencies in all parts of Westchester County. Any disaster requiring a response from many agencies has the potential for injury and loss of life. The devastation caused by any disaster in our region will be multiplied because of the gross inadequacy of inter-agency communications in the region.

In our opinion, an effective Emergency Service Interagency Radio System would alleviate most of the present communications problems. There are many ways in which such a system could be implemented including using the present system and expanding it, by using a system interconnecting the many smaller systems presently in existence, or by establishing a new radio network with the sole purpose of allowing all emergency services to be able to communicate with each other. Such a new system would certainly enable officials in Westchester County to maximize the resources presently available from volunteer departments and governmental agencies. We urge the New York State Legislator to provide the resources necessary to improve emergency communications in our region.

Respectfully submitted,



Robert S. Kramer
Captain



WESTCHESTER COUNTY
EMERGENCY MEDICAL SERVICES COUNCIL INC.
Westchester County Medical Center
Sunshine Cottage
Valhalla, New York 10595
(914) 347-4968

EXECUTIVE COMMITTEE

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Program Administrator /

Exec. Director

PRESENTATION AT PUBLIC HEARING:

EMERGENCY COMMUNICATIONS IN NEW YORK STATE

FEBRUARY 22, 1984

WORLD TRADE CENTER

THE PURPOSE OF AN EMERGENCY MEDICAL SERVICES SYSTEM IS TO PROVIDE IMMEDIATE CARE AND TREATMENT TO SICK AND INJURED INDIVIDUALS IN LIFE-THREATENING MEDICAL EMERGENCIES. TO FACILITATE THIS PURPOSE AMBULANCES AND HOSPITALS USE EXTENSIVE RADIO COMMUNICATIONS TO PROVIDE FOR THE DISPATCH OF AMBULANCES AND THE CONTINUOUS AND COMPREHENSIVE CARE OF A VICTIM 24 HOURS A DAY, SEVEN DAYS A WEEK. PRE-HOSPITAL CARE OF PATIENTS HAS ADVANCED RAPIDLY. AMBULANCES ARE NO LONGER " MEAT WAGONS" THAT PICK PATIENTS UP AND RUSH THEM TO A HOSPITAL. THEY ARE WELL-EQUIPPED, VEHICLES STAFFED BY CERTIFIED EMERGENCY MEDICAL TECHNICIANS AND PARAMEDICS USING MODERN MEDICAL TECHNIQUES AND SOPHISTICATED EQUIPMENT TO PROVIDE THE BEST AVAILABLE PRE-HOSPITAL CARE AND TREATMENT. THEIR EFFORTS ARE STYMIED BY THE LACK OF AN APPROPRIATE

* Lawrence J.
Klecatsky, M.D.
Treasurer

NUMBER OF RADIO FREQUENCIES AND EXTREME OVERCROWDING OF THE FREQUENCIES THEY ARE NOW ASSIGNED. IN WESTCHESTER COUNTY AMBULANCE SERVICES UTILIZE VHF FREQUENCIES ON THE 155 BANDS. THESE FREQUENCIES ARE USED BY VOLUNTEER AMBULANCE CORPS, FIRE RESCUE AND COMMERCIAL AMBULANCES FOR DISPATCH AS WELL AS FOR COUNTY DISPATCH AND COORDINATION.

THESE FREQUENCIES INCLUDE:

155.160	155.265
155.175	155.280
155.205	155.340
155.220	155.400
155.235	ETC.

IN WESTCHESTER ALONE THERE ARE 44 MUNICIPALITIES WITH A POPULATION OF 867,000. OF THE AMBULANCE SERVICES IN WESTCHESTER COUNTY SIX ARE COMMERCIAL, 21 ARE INDEPENDENT VOLUNTEERS, AND 13 ARE VOLUNTEER FIRE DEPARTMENTS. ONE IS RUN BY A CITY FIRE DEPARTMENT, ONE BY A POLICE DEPARTMENT AND ONE BY A HOSPITAL.

FOUR AREAS OF PRIMARY CONCERN TO WESTCHESTER COUNTY EMS ARE:

1. THE ADEQUACY OF LOCAL EMERGENCY COMMUNICATIONS.
2. APPROACHES TO REMEDY EXISTING DEFICIENCIES IN THE SYSTEM
3. POSSIBILITIES FOR JOINT COOPERATION WITH ADJACENT STATES AND, FINALLY,
4. COMMUNICATION NEEDS IN NEW YORK TO THE YEAR 2000 AND BEYOND.

ALL OF THE COMMUNICATION PROBLEMS THAT I WILL REFER TO DO NOT ONLY COME FROM WITHIN WESTCHESTER COUNTY. RADIO FREQUENCIES KNOW NO BOUNDARIES. WE GET SPILL OVER AND "FEED BACK" FROM SURROUNDING STATES AND COUNTIES.

THE PHRASE "ADEQUACY OF LOCAL EMERGENCY COMMUNICATIONS" IS A MISNOMER. I WOULD LIKE TO ADDRESS THE INADEQUACY OF LOCAL EMERGENCY COMMUNICATIONS. EMS FREQUENCIES ARE PROVIDED FOR IN THE FCC RULES UNDER SUBPART C - SPECIAL EMERGENCY RADIO SERVICE. UNDER THIS RULE THESE FREQUENCIES MAY BE USED BY: MEDICAL SERVICES (INCLUDES AMBULANCES, RESCUE ORGANIZATIONS AND HOSPITALS), VETERINARIANS, HANDICAPPED PERSONS, DISASTER RELIEF ORGANIZATIONS, SCHOOL BUSES AND BEACH PATROLS. THESE FREQUENCIES ARE OVERCROWDED. AMBULANCE SERVICES TRYING TO DISPATCH UNITS TO LIFE-THREATENING EMERGENCIES ARE CONSTANTLY BEING CUT OUT OR STEPPED ON BY OTHER SERVICES THAT ARE NOT CONDUCTING EMERGENCY BUSINESS. THESE INCLUDE:

- SCHOOL BUS VEHICLES USED BY PRIVATE CARRIERS CONTRACT CARRIERS AND SCHOOL DISTRICTS.
- SECURITY SERVICES INCLUDING HOSPITAL SECURITY
- AMBULETTES PROVIDING NON-EMERGENCY TRANSPORT SERVICES THAT ARE NOT PART OF AN EMERGENCY AMBULANCE SERVICE

ON THE EMS FREQUENCIES IN WESTCHESTER COUNTY NOT ONLY ARE THERE THE AMBULANCE SERVICES, BUT THERE ARE 42 SCHOOL BUS COMPANIES PLUS SCHOOL DISTRICTS WITH VEHICLES AND THERE ARE 6 NON-EMERGENCY AMBULETTE OR WHEEL CHAIR TRANSPORT SERVICES. IT IS IMPORTANT TO NOTE THAT EACH OF THOSE SCHOOL BUS SERVICES HAVE BETWEEN 50-80 VEHICLES. MULTIPLIED BY 42 THAT COMES OUT TO BETWEEN 2,100 AND 3,360 VEHICLES WITH RADIOS. DURING SCHOOL HOURS, ESPECIALLY, THE RADIO TRAFFIC ON THESE FREQUENCIES IS NON-STOP. IT IS VERY DIFFICULT TO DISPATCH A LIFE-THREATENING AMBULANCE CALL WITH THE SCHOOL BUS UNITS CONSTANTLY TALKING!

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WE MUST DEAL WITH TWO PROBLEMS. ONE - WHAT WE CAN DO TO KEEP THE OVERCROWDING FROM GETTING WORSE. TWO - WHAT WE CAN DO TO ALLEVIATE THE PROBLEM THAT NOW EXISTS.

UNDER FCC RULES AND REGULATIONS SUBPART C SECTION 90.175 (ENTITLED FREQUENCY COORDINATION REQUIREMENTS) PARAGRAPH (2) (e) (2) APPLICATIONS FOR FREQUENCIES IN THE SPECIAL EMERGENCY RADIO SERVICE DO NOT HAVE TO BE ACCOMPANIED BY EVIDENCE OF FREQUENCY COORDINATION, EXCEPT AS REQUIRED BY SECTION 90.58 (b) (8). THIS SECTION STATES THAT ANY APPLICATION FOR USE OF A SPECIFIED AVAILABLE BAND MUST BE ACCOMPANIED BY A SIGNED STATEMENT THAT ALL OTHER RADIO SERVICES OPERATING ON A FREQUENCY 15 KHZ REMOVED AND ARE LOCATED 10-35 MILES FROM THE PROPOSED BASE STATION HAVE BEEN NOTIFIED OF THE APPLICANT'S INTENT TO FILE. UNDER THIS SECTION AN APPLICANT DOES NOT HAVE TO NOTIFY THE RADIO SERVICES ON THE FREQUENCY FOR WHICH HE IS APPLYING. AMBULANCE FREQUENCIES FALL UNDER SECTION 90.58.

WE FEEL THAT THIS SECTION SHOULD BE CHANGED TO PROVIDE FOR FREQUENCY COORDINATION ON EMS FREQUENCIES. THIS COULD SOLVE FUTURE PROBLEMS BY PROVIDING FOR THE SCREENING OF APPLICANTS AND BY ALLOWING THE EXISTING SERVICES ON THESE FREQUENCIES TO VOICE THEIR OBJECTIONS, IF ANY. IT WOULD ALSO HELP ALLEVIATE A GREAT DEAL OF RADIO TRAFFIC BY LIMITING THE NUMBER OF UNITS LICENSED TO OPERATE ON THESE FREQUENCIES.

IT WILL BE MORE COSTLY AND DIFFICULT TO CLEAN UP WHAT CURRENTLY EXISTS. A SOLUTION IS EITHER TO SPLIT THE CURRENT FREQUENCIES BY PUTTING AMBULANCES AND SCHOOL BUSES ON SEPARATE FREQUENCIES OR ESTABLISHING NEW EMS FREQUENCIES TO BE USED BY AMBULANCES ONLY.

WE ARE ASKING YOU TO HELP US BY PETITIONING THE FCC TO CHANGE THE RULES AND REGULATIONS TO PROVIDE FOR FREQUENCY COORDINATION ON EMS FREQUENCIES. WE ARE ALSO ASKING YOU TO WORK WITH US IN FINDING A SUITABLE AND MOST COST EFFECTIVE WAY TO CLEAN UP THE OVERCROWDING THAT NOW EXISTS.

THE POSSIBILITIES FOR JOINT COOPERATION WITH ADJACENT STATES IS CRITICAL TO THE OVERCROWDING PROBLEM BECAUSE WE NOW RECEIVE A GREAT DEAL OF "FEED BACK" AND SPILLOVER FROM THEM ON OUR OWN FREQUENCIES. WE MUST WORK WITH NEW JERSEY AND CONNECTICUT TO TRY AND CUT DOWN ON THIS PROBLEM. IT IS IMPERATIVE THAT ALL THREE STATES USE THE SAME APPROACH OR ELSE WE WILL NEVER CLEAR UP THE PROBLEMS THAT NOW EXIST IN NEW YORK.

AT THE RATE WE ARE GOING NOW COMMUNICATIONS SYSTEMS IN WESTCHESTER COUNTY MAY NOT MAKE IT TO THE YEAR 2000. THE REASONS ARE THE PROBLEMS WE HAVE DISCUSSED. THERE ARE CURRENTLY TOO MANY AND A CONSTANTLY GROWING NUMBER OF USERS ON THESE FREQUENCIES. THESE ARE EMERGENCY, AND I UNDERLINE EMERGENCY, FREQUENCIES THAT SOUND LIKE A CB RADIO SYSTEM INSTEAD OF AN EMERGENCY FREQUENCY. IT IS FRUSTRATING AND AT TIMES ALMOST IMPOSSIBLE TO DISPATCH AMBULANCES ON LIFE-THREATENING EMERGENCIES WHEN MESSAGES ARE CONSTANTLY BEING STEPPED ON, CUT OUT AND INTERMINGLED WITH OTHER MESSAGES. IF WE ALLOW THE ALLOCATION OF FREQUENCIES TO MORE AND MORE OPERATORS BY THE YEAR 2000 NO ONE WILL BE ABLE TO TRANSMIT MESSAGES.

THE SERIOUS PROBLEMS OF EMERGENCY MEDICAL COMMUNICATIONS HAVE BEEN DISCUSSED AD NAUSEAM FOR TOO MANY YEARS. COMMUNICATIONS ARE A NIGHTMARE.

Presentation: 2/22/84

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WE CALL FOR ACTION NOW. THE FCC RULES MUST PROVIDE ADEQUATE AND COORDINATED FREQUENCIES DEVOTED SOLELY TO EMERGENCY MEDICAL SERVICES. OUR PRIMARY CONCERN IS TO SAVE LIVES AND REDUCE DISABILITY. FUNDAMENTAL TO THIS TASK IS AN ADEQUATE COMMUNICATIONS SYSTEM.

WESTCHESTER COUNTY EMERGENCY MEDICAL SERVICES COUNCIL, INC.