

June 1, 2012

To: Codes and Standards Administration Department

NFPA

1 Batterymarch Park Quincy, MA 02169-7471

The National Association of Emergency Medical Technicians (NAEMT) appreciates the opportunity to comment on the possible establishment of a new document on the design, performance, testing, and certification of two-way, portable (hand-held) land mobile radios (LMR) for use by emergency services personnel.

NAEMT recognizes that, over the past several years, many technology improvements have been made in emergency services radio communications. All emergency services systems have benefited from these improvements. It is also recognized that each emergency services system has unique needs and challenges as they serve diverse populations in a range of geographic environments through a variety of delivery models supported by varying levels of infrastructure and resources, with each system having different expectations for their radio communications.

Given this mix of variables, NAEMT believes that any attempt to propose a national "one-size-fits-all" radio standard would most likely increase the cost of radio communications with no measurable improvement in our ability to communicate. While some industry standards can have a positive impact, we believe emergency services providers, as end-users of radio systems, can most accurately and effectively provide to radio manufacturers the standards that they believe are needed based on their use of this equipment. Further, NAEMT believes that all emergency services systems should regularly assess their radio communications needs and ensure that policies and procedures are in place to address internal requirements for proper channels, safety alerting capability, tone alerting and interoperability.

Formed in 1975 and more than 32,000 members strong, the National Association of Emergency Medical Technicians (NAEMT) is the nation's only organization solely dedicated to representing the professional interests of all EMS practitioners, including paramedics, emergency medical technicians, emergency medical responders and other professionals working in pre-hospital emergency medicine. NAEMT members work in all sectors of EMS, including government service agencies, fire departments, hospital-based ambulance services, private companies, industrial and special operations settings, and in the military.

NAEMT appreciates the opportunity to comment on this proposal. Please feel free to contact us if you have any questions.

Sincerely,

Connie Meyer

President, NAEMT

Consie a. Meyer, President