

April 1, 2010

Mr. William Cross
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Federal Communications Commission
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Mr. Jeff Cohen
Public Safety and Homeland Security Bureau
Federal Communications Commission
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WP Docket No. 10-54

Dear Sirs:

This letter is in support of the American Hospital Association's request for waiver of section 97.113(a)(3).

The Kaiser Permanente Amateur Radio Network (KPARN) has been in existence since 1985. It is composed of FCC licensed amateur radio operators who are KP employees, retired employees and community volunteers. The mission of KPARN is:

The Kaiser Permanente Amateur Radio Network (KPARN) is an organization of Federal Communication Commission licensed amateur radio operators who volunteer time and technical expertise to support the emergency preparedness mission of Kaiser Permanente Health System through redundant communication technologies.

KPARN provides two way radio technology and amateur radio operators to thirteen medical centers, the regional data center and regional EOC located across five counties (Los Angeles, Riverside, Orange, San Diego and San Bernardino) in Southern California. This is an area of over 40,000 square miles (larger than fifteen states) separated by four mountain ranges. A similar organization, BAHN (Bay Area Hospital Network), exists in Northern California and supports an additional twenty one (21) Kaiser hospitals. BAHN also supports many other non Kaiser Hospitals in the Bay Area.

Since 1985, Kaiser employees have volunteered time (lunch breaks, days off, etc) to support the KPARN mission. During these twenty plus years of support to the emergency preparedness mission of the hospitals, KPARN staff have participated numerous drills and actual events. Typically KPARN and BAHN hold monthly drills with the amateur radio equipment installed in the hospitals to assure operational

capabilities as well as practice network operations. Having operators who are familiar with the equipment, location of the equipment and hospital policies and procedures as well as nomenclature has been an integral part of the success of KPARN.

Kaiser Permanente is a non-profit organization. The FCC October 20, 2009 request for waiver by governmental agencies does not apply to non-profit hospitals, even though hospitals are critical to emergency response and patient medical care.

Since 1985 KPARN has proven to be a valuable asset to hospital emergency planners. It is not the primary communications network, but it does provide a valuable redundant and extensive network to interface with numerous emergency partners spread across a wide geographic area.

It is based on this twenty plus years of KPARN volunteer amateur radio experience in hospitals, that we request the FCC to consider and approve the AHA request for waiver.

Sincerely,

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