



Legal Department

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VIA USPS and EMAIL: legal@radioreference.com

Lindsay C. Blanton III, President
RadioReference.com
1150 N Loop 1604 W, Suite 108
San Antonio, TX 78248

**RE: Notice of Infringement
Digital Millennium Copyright Act of 1998 (DMCA)**

Dear Mr. Blanton,

Priority Dispatch Corp. ("Priority Dispatch") is the exclusive world-wide proprietor of the Emergency Priority Dispatch System ("EPDS") for emergency disciplines. The EPDS is an emergency protocol system licensed to emergency dispatch centers and Public Safety Answering Points (PSAP) throughout the world. The EPDS is currently in use in 54 countries and in 27 languages. The EPDS includes, among other things, Key Questions, Pre-Arrival Instructions®, Post-Dispatch Instructions®, determinant codes and descriptors for three disciplines: Medical, Fire, and Police.

The Medical Priority Dispatch System (MPDS®) is the original and most advanced emergency call-taking system in the world. It allows emergency communication centers to eliminate the impractical and dangerous practice of freelance call-taking. The structured approach guides call takers to quickly gather the right information, dispatch the right help, and when necessary, provide lifesaving support. The Fire Priority Dispatch System (FPDS®) is the most comprehensive, up-to-date Fire/Rescue Protocols, Pre-Arrival Instructions® and Post-Dispatch Instructions® in the world. The Police Priority Dispatch System (PPDS®) is the leading structured police call-taking system of protocols and instructions, designed to assist emergency dispatchers gather and relay additional critical information to police to increase officer, victim, and bystander safety.

Priority Dispatch has expended considerable time, effort, and resources in developing its intellectual property and in perfecting its rights. The EPDS is protected by national and international patents, trademarks, and copyright laws, as well as laws and conventions and treaties protecting intellectual property rights. The MPDS®, FPDS®, and PPDS® are extremely valuable business assets that differentiate Priority Dispatch from the competition. Consequently, Priority Dispatch is very vigilant and active in pursuing those that reproduce, distribute, copy, publicly display, or adapt their contents (in whole or in part) without authority or consent. In addition, the MPDS is protected in the U.S. by 21 issued patents and 4 pending patent applications, and there are 110 issued foreign patents and 30 pending foreign patent applications protecting the intellectual property abroad. Only authorized and properly licensed users may use in any way or have access to the MPDS®. Consequently, Priority Dispatch has reasonable expectations that others will respect its intellectual property rights.

Priority Dispatch has recently become aware that a RadioReference.com webpage has been posted with unauthorized copyrighted information belonging to Priority Dispatch. The infringing content can be seen at https://wiki.radioreference.com/index.php/Priority_Dispatch_Codes# (last visited April 16, 2022).

Specifically, the copyrighted information we are concerned about is referred to as “the dispatch determinants (codes) utilized in the Priority Dispatching™ system by the National Academy of Emergency Dispatch™ (NAED™)” and includes “alphanumeric codes” and “generic text descriptors for each code, and any applicable suffixes (special situations).” The information online, accompanying tables, and descriptions are part of the EPDS, and as such are not authorized to be posted.

In light of the foregoing, we respectfully request that you immediately remove these materials from the aforementioned webpage, and from any other webpage or similar publicly available medium under your custody or control, and notify me in writing confirming this action no later than April 22, 2022.

In the alternative, you may continue to publish the above-referenced webpage with Priority Dispatch’s Determinant Codes and Descriptors for an annual fee of \$225,000, payable thirty days from the date of this letter, and annually no later than January 31 of each following year. If we do not receive written confirmation that Priority Dispatch’s copyrighted information has been removed by the appointed date, and the webpage is still up and active, we will initiate billing or seek a restraining order to protect our rights. Furthermore, it’s worth noting that the information published on your website is outdated and inaccurate, and would be considered potentially dangerous if used or relied on by PSAPs, responders, or the general public.

I have a good faith belief that the use of the copyrighted material described above on the allegedly infringing web pages is not authorized by the copyright owner nor its agent, or by protection of law.

I swear, under penalty of perjury, that the information in the notification is accurate and that I am authorized to act on behalf of its rightful owner and on behalf of an exclusive right that is allegedly infringed.

This notice is written without prejudice to or waiver of our rights, all of which are hereby expressly reserved. If you require further information, I can be reached at the numbers listed at the top of this letter.

Respectfully submitted,

/s/ J. Simón Cantarero
General Counsel

cc: Jeff J. Clawson, M.D.
Medical Director and Founder
International Academies of Emergency Dispatch

Brian Dale
President
Priority Dispatch Corp.