

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of )  
 )  
Amendment of Parts 1, 22, 24, 27, 74, 80, 90, ) WT Docket No. 10-112  
95 and 101 To Establish Uniform License Renewal, )  
Discontinuance of Operation, and Geographic )  
Partitioning and Spectrum Disaggregation Rules )  
and Policies for Certain Wireless Radio Services )

**OPPOSITION TO REQUEST FOR CLARIFICATION OF THE ENTERPRISE  
WIRELESS ALLIANCE**

The Association of Public-Safety Communications Officials-International, Inc. (APCO)<sup>1</sup> hereby opposes the Enterprise Wireless Alliance’s (EWA) Request for Clarification<sup>2</sup> in the above-captioned proceeding.<sup>3</sup> No clarification is needed with regard to the Commission’s decision to exempt public safety licensees from the revised renewal procedures. EWA’s filing is a thinly-veiled attempt to re-argue the Commission’s decision, and the Request should be dismissed.

EWA’s Request states that it “disagrees with the FCC’s decision to exempt public safety licensees from the revised renewal procedures,” and goes on to question the Commission’s judgment rather than seek clarification on how to comply with the revised renewal procedures.

EWA does not introduce new information or explain how circumstances have changed since the

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<sup>1</sup> Founded in 1935, APCO is the nation’s oldest and largest organization of public safety communications professionals. APCO is a non-profit association with over 30,000 members, primarily consisting of state and local government employees who manage and operate public safety communications systems – including Public Safety Answering Points (PSAPs), dispatch centers, emergency operations centers, radio networks, and information technology – for law enforcement, fire, emergency medical, and other public safety agencies.

<sup>2</sup> Request for Clarification of EWA, WT Docket No. 10-112 (filed Oct. 2, 2017).

<sup>3</sup> Amendment of Parts 1, 22, 24, 27, 74, 80, 90, 95, and 101 to Establish Uniform License Renewal, Discontinuance of Operation, and Geographic Partitioning and Spectrum Disaggregation Rules and Policies for Certain Wireless Services, WT Docket No. 10-112, *Second Report and Order and Further Notice of Proposed Rulemaking*, FCC 17-105 (rel. Aug. 3, 2017) (“R&O”).

public comment period in this proceeding closed. The Commission fully considered whether to exempt public safety licensees from certain renewal requirements as part of the rulemaking, and nothing in EWA's Request warrants reconsideration or clarification.<sup>4</sup>

Once again, EWA is unnecessarily taxing the limited resources of the Commission.<sup>5</sup> The Request for Clarification should therefore be dismissed.

Respectfully submitted,

APCO INTERNATIONAL

By: /s/

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<sup>4</sup> R&O at n. 28 (declining EWA's request that the Commission extend its new renewal policies to public safety licensees).

<sup>5</sup> See Reply Comments of APCO, File No. 0007375570, at 2-3 (filed June 23, 2017).

**CERTIFICATE OF SERVICE**

I, Mark S. Reddish, senior counsel at the Association of Public-Safety Communications Officials-International, Inc., hereby state that true copies of the foregoing **OPPOSITION TO REQUEST FOR CLARIFICATION OF THE ENTERPRISE WIRELESS ALLIANCE** were sent by U.S. Mail, February 12, 2018, to the attached Service List.

/s/

Mark S. Reddish

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