

**Before the
Federal Communications Commission
Washington, DC 20554**

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| In the Matter of |) | |
| |) | |
| Proposed Amendments to the Service Rules |) | PS Docket No. 13-87 |
| Governing Public Safety Narrowband Operations in |) | |
| the 769-775/799-805 MHz Bands |) | |
| |) | |
| National Public Safety Telecommunications |) | RM-11433 |
| Council Petition for Rulemaking on Aircraft Voice |) | |
| Operations at 700 MHz |) | |
| |) | |
| National Public Safety Telecommunications |) | RM-11433 |
| Council Petition for Rulemaking to Revise 700 |) | |
| MHz Narrowband Channel Plan |) | |
| |) | |
| Region 24 700 MHz Regional Planning Committee |) | WT Docket No. 96-86 |
| Petition for Rulemaking |) | PS Docket No. 06-229 |
| |) | |
| State of Louisiana Petition for Rulemaking |) | RM-11577 |

COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc. (APCO) hereby submits the following comments in response to the Commission’s Notice of Proposed Rulemaking (Notice) in the above-captioned proceedings.¹

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 26,000 members, primarily consisting of state and local government employees who manage and operate public safety communications systems – including 9-1-1 Public Safety Answering Points (PSAPs), radio networks, and information technology – for law enforcement, fire, emergency medical, and other public safety agencies. APCO appears regularly before the Commission on a wide range of public safety

¹ Proposed Amendments to the Service Rules Governing Public Safety Narrowband Operations in the 769-775/799-805 MHz Bands, Order on Reconsideration and Further Notice of Proposed Rulemaking, FCC 16-111 (rel. Aug. 22, 2016) (Notice).

communications issues, and is the largest FCC-certified frequency coordinator for Part 90 Public Safety Pool channels.

Here, APCO expresses support for amending the trunking rules for vehicular repeater systems (VRS), suggests further action to ensure interoperability on 700 MHz interoperability channels, and offers views on Motorola's Petition for Clarification.

I. APCO Supports Amendment of the Trunking Rules

The Commission asks whether to amend its rules to exempt VRS from the 700 MHz narrowband trunking requirement.² APCO supports amending Section 90.537 as proposed. There is significant demand for VRS in 700 MHz, and APCO is unaware of options for trunked VRS equipment or trunking VRS operations. While APCO recognizes the benefits of efficient spectrum use, VRS are typically associated with a single user vehicle or multiple users centered on a single scene of activity. Thus, trunking is not necessary for 700 MHz VRS equipment.

II. The Commission's Rules Should Ensure Baseline Functionality and Interoperability of Any Common Features for Devices Operating on 700 MHz Interoperability Channels

The Commission asks whether adopting the P25 CAP AP's list of 15 recommended feature sets would establish a baseline for interoperability, inform procurement decisions by first responders using federal funds, and help public safety users determine whether a specific 700 MHz radio is interoperable across vendors and can perform in compliance with the Commission's rules before marketing or sale.³

In concept, APCO supports establishing specific functions for baseline interoperability for the 700 MHz interoperability channels. APCO defers to the P25 CAP AP on what those specific functions should entail but believes the baseline should go beyond minimal voice communications. Codifying baseline feature sets that match public safety user preferences into the Commission's rules would

² Notice at para. 33.

³ *Id.* at 37.

inform procurement decisions at all levels and support interoperability among agencies whether federal, state, local, or tribal.

Manufacturers have a responsibility to ensure that all public safety users – regardless of whose customer they are – have seamless interoperability for operations on the nationwide interoperability channels. Codifying baseline feature sets and the Commission’s recent action to require CAP compliance or the equivalent prior to the marketing or sale of equipment will substantially promote interoperability. APCO believes that manufacturers should be required to demonstrate interoperability with respect to any additional features offered for public safety agencies to utilize in mutual aid situations. Further, interoperability requirements should not be limited to just voice; the Commission should encourage appropriate testing for features such as packet data, location information, encryption management, and other capabilities offered on P25 devices. APCO defers to the P25 CAP AP on the most efficient process to ensure that while manufacturers are able to innovate and add new features for devices, they quickly become interoperable with other devices that subsequently offer common features.

APCO agrees with the P25 CAP AP that a healthy dialogue among agencies is an essential part of interoperable communications.⁴ While the public safety community has made major strides, it could benefit from increased collaboration and best practices development. Codification of certain interoperability best practices into the Commission’s rules would likely be impractical given the rapidly evolving nature of technology and public safety communications. APCO would, however, support efforts to facilitate more dialogue between agencies regarding features and best practices for interoperable communications.

The Commission seeks comment on the most effective means to document whether a radio that operates on the 700 MHz narrowband interoperability channels with the referenced feature sets and

⁴ See Notice at para. 39.

capabilities would facilitate interoperable communications among public safety users.⁵ For manufacturers going through P25 CAP, appropriate documentation will be part of the declaration provided as part of this process. For manufacturers using an alternative testing protocol, APCO suggests that an attestation document from the manufacturer could be displayed with the other FCC equipment authorization documentation on the FCC's website.

III. Motorola Solutions Petition for Clarification

APCO believes that all narrowband mobile and portable 700 MHz band public safety radios must be capable of operating on all of the narrowband interoperability channels using the standards specified in Section 90.548 regardless of the technology used for communications on non-interoperability channels and as a baseline function of the device as offered. In other words, there should not be any additional software, firmware, hardware, or technology changes required. APCO also believes that the Commission's rules do not require that every radio have every interoperability channel programmed into it and available to the user. APCO would not, however, support an interpretation of the rules such that all operations on 700 MHz narrowband channels would have to conform to the standards described in Section 90.548.

Respectfully submitted,

APCO INTERNATIONAL

By: /s/

Jeffrey S. Cohen
Chief Counsel
(571) 312-4400 ext. 7005
cohenj@apcointl.org

Mark S. Reddish
Senior Counsel
reddishm@apcointl.org

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⁵ Notice at para. 38.