

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

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 )

**COMMENTS OF APCO INTERNATIONAL**

The Association of Public-Safety Communications Officials-International, Inc. (APCO) hereby submits the following comments in response to the Public Safety and Homeland Security Bureau’s and International Bureau’s Public Notice in the above-captioned proceeding.<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 27,000 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), emergency operations centers, radio networks, and information technology—for law enforcement, fire, emergency medical, and other public safety agencies.

The Bureaus seek comment on "how to best provide reliable and seamless air-ground communications in the 700 MHz band in the U.S. and Canada, while avoiding undue disruption

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<sup>1</sup> Public Safety and Homeland Security Bureau and International Bureau Seek Comment on Airborne Use of 700 MHz Public Safety Narrowband Air-Ground Channels by the United States and Canada, PS Docket No. 13-87, *Public Notice*, DA 17-251 (Public Safety and Homeland Security Bur., International Bur., rel. Mar. 15, 2017) (“Notice”).

of existing terrestrial facilities in both countries,” and offer two proposals to accomplish this goal.<sup>2</sup>

The Bureau’s proposal to share the eight channels that the U.S. designated for airborne use<sup>3</sup> is not ideal because that would simply halve the current number of channels that U.S. public safety licensees may use, and thus require those licensees to relocate to the remaining channels. No other public safety spectrum is dedicated to supporting air-ground communications.

Additionally, the alternative proposal to have Canada designate a separate set of 700 MHz channels presently designated for U.S. use (whether for General Use or State License)<sup>4</sup> is problematic because U.S. public safety licensees already face a shortage of available spectrum to carry out their missions. Further, APCO seeks to avoid, to the extent possible, any new need to require relocation of public safety incumbents. Use of existing 700 MHz narrowband allocations would also be very complicated to implement, given the variations in usage along the border and differences in terrain affecting acceptable height and power levels.

Rather, APCO prefers proposals being put forth by others in initial comments that recommend use of the 700 MHz Guard Band B Block at 775-776/805-806 MHz. This represents a creative approach that would accomplish the goals of this proceeding to reliably and seamlessly meet the airborne spectrum needs of both the U.S. and Canada, while minimizing the effects on terrestrial U.S. incumbents. Moreover, use of the 700 MHz Guard Band B Block would make more efficient use of the electromagnetic spectrum. In the U.S., and according to the Commission’s Universal Licensing System, there are no active Guard Band licenses in the B Block. And, other use of this band in the U.S. is limited to secondary use by television translator

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<sup>2</sup> *Id.* at 1-2.

<sup>3</sup> *Id.* at 2.

<sup>4</sup> *Id.*

stations.<sup>5</sup> Additional benefits of employing the 775-776/805-806 MHz band include: minimizing impacts to existing operations; avoiding the need for relocation of incumbents; easing the process needed for international coordination; and accommodating the disparate height and power limits between the two countries.

While more work would remain to select channels and address any interference concerns, APCO strongly encourages the Bureaus to consider the Guard Band B Block for airborne use along the U.S. and Canadian border.

Respectfully submitted,

APCO INTERNATIONAL

By: /s/

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<sup>5</sup> See 47 CFR §74.602. In Canada, these frequencies are already part of spectrum allocated for public safety use.