Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Revision of Part 15 of the Commission's	)	ET Docket No. 13-49
Rules to Permit Unlicensed National Information	)	
Infrastructure (U-NII) Devices in the 5 GHz	)	
Band	)	

COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc. (APCO) hereby submits the following comments in response to the Commission's Public Notice in the above-captioned proceeding.[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 25,000 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. As the deployment of NG9-1-1 and the FirstNet nationwide public safety broadband network facilitate enhanced capabilities for emergency communications, PSAPs will serve an increasingly important role as the "nerve center" of emergency response. PSAPs will manage data flows for a variety of systems to ensure a more effective emergency response.

[1] The Commission Seeks to Update and Refresh the Record in the "Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band," *Public Notice*, ET Docket 13-49 (Rel. June 1, 2016). Available at http://transition.fcc.gov/Daily_Releases/Daily_Business/2016/db0601/FCC-16-68A1.pdf.

APCO appreciates the Commission's interest in refreshing the record in this proceeding, particularly given the pace at which wireless technology is advancing and the implications for public safety. APCO's interest in this proceeding is to offer examples of important public safety use cases that can be made possible through Dedicated Short Range Communications (DSRC), and stress the corresponding need to ensure adequate interference protection for such operations.

DSRC – Vehicle to Vehicle (V2V) and Vehicle to Infrastructure (V2I) technologies – could provide dynamic capabilities to responders on scene and in transmitting/receiving data to/from PSAPs and responders. For example, PSAPs could receive automated advance crash notifications (AACN) with data such as vehicle location, number of passengers, seat belt usage, airbag status, point of impact, velocity, likelihood of injury, vehicle's final resting position (e.g., overturned), infrastructure damage, medical info and patient history, unique hazards, and electronic manifests from commercial vehicles. This would assist public safety telecommunicators with getting the needed resources to those in need more quickly and providing critical pre-arrival information to responders. Advanced vehicle communications systems could also make it possible to improve scene safety by notifying oncoming traffic of accidents and creating safe zones around public safety personnel and accident victims.

With regard to spectrum sharing in the band, APCO recommends that any sharing arrangement ensure that no harmful interference occurs to public safety applications in the 5.9 GHz band. Any sharing techniques under consideration should undergo substantial testing and be proven effective in advance, before being used in a way that could impact public safety communications. In this way, the Commission could best promote the advancement of V2V and V2I's lifesaving potential.

CONCLUSION

APCO encourages the Commission to take into account the many potential public safety benefits made possible with DSRC technologies and maximize protection of such applications from harmful interference.

Respectfully submitted,

APCO INTERNATIONAL

By: /s/

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

July 7, 2016