

**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)	
)	
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

REPLY COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc. (APCO) hereby submits the following reply comments in response to the Commission’s Public Notice concerning 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.

APCO submits these Reply Comments to address concerns regarding the codification of rules to ensure interoperability for devices operating on 700 MHz interoperability channels.² APCO continues to believe, consistent with its Comments³, that the Commission's rules should ensure baseline functionality and interoperability of any common features for devices operating on 700 MHz interoperability channels, and there is no reason to delay the adoption of such rules.

The newly-adopted rules and those to come from the Further Notice will promote interoperability by codifying what manufacturers have been required to do, and what they should do, for public safety. Manufacturers should already be providing equipment that is fully interoperable in the 700 MHz nationwide channels.⁴ Further, with the revised list of feature sets provided by the P25 Compliance Assessment Program (CAP) Advisory Panel (AP)⁵, all of the recommended baseline feature sets are defined by existing standards and included in the P25 CAP testing. Thus, the adoption of baseline interoperability requirements should not result in additional costs,⁶ and there is no basis for

² Comments of Motorola Solutions, Inc., PS Docket No. 13-87, RM-11433, WT Docket No. 96-86, PS Docket No. 06-229, RM-11577 (filed Oct. 26, 2016), at 4 (suggesting that testing under the CAP compliance program could delay the introduction of new products and serves as a “perverse disincentive to innovation for public safety technologies”).

³ Comments of APCO, PS Docket No. 13-87, RM-11433, WT Docket No. 96-86, PS Docket No. 06-229, RM-11577 (filed Oct. 26, 2016).

⁴ APCO notes that manufacturers are already required by FCC rules (90.548), federal grant conditions (<https://www.dhs.gov/science-and-technology/p25-cap-grant-eligible-equipment>), and a general obligation to the public safety community to make available interoperable radios, particularly for the 700 MHz nationwide interoperability channels.

⁵ See, Comments of the P25 CAP AP, PS Docket No. 13-87, RM-11433, WT Docket No. 96-86, PS Docket No. 06-229, RM-11577 (filed Oct. 26, 2016).

⁶ One commenter was concerned that manufacturers would pass along increased costs to public safety users. Comments of the Commonwealth of Virginia, PS Docket No. 13-87, RM-11433, WT Docket No. 96-86, PS Docket No. 06-229, RM-11577 (filed Oct. 25, 2016), at 8-9 (suggesting that new capabilities must be phased in gradually to allow public safety users to absorb the costs of new equipment). The new and proposed rules stemming from this proceeding will only help to further ensure that manufacturers meet their existing obligations to provide interoperable equipment to public safety users operating in the 700 MHz nationwide interoperability channels. Thus APCO would not expect any additional costs from new rules that only codify existing obligations.

delaying these steps⁷ to ensure first responders can seamlessly interoperate as was intended when the 700 MHz nationwide channels were made available to public safety. As explained in APCO's Comments, while APCO defers to the P25 CAP AP on what the specific baseline functions should entail, these features should go beyond minimal voice communications.⁸

Finally, and specifically with regard to concern that the P25 CAP's requirements could create disincentives for innovation and delay the introduction of new technologies for public safety⁹, APCO believes such concerns are unwarranted. While APCO is unaware of any instances in which the P25 CAP's requirements delayed the introduction of new features, it is important to note that the P25 CAP already includes an exception procedure that can be utilized to mitigate this situation. APCO continues to believe that manufacturers should be required to demonstrate interoperability with respect to any additional features, not just voice, offered for public safety agencies to utilize in mutual aid situations. 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.

Respectfully submitted,

APCO INTERNATIONAL

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⁷ Comments of Motorola Solutions, Inc., at 5.

⁸ Comments of APCO at 2.

⁹ Comments of Motorola Solutions, Inc., at 8-9.