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August 5, 1994

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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BY HAND

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: PR Docket 92-235

Dear Mr. Caton:

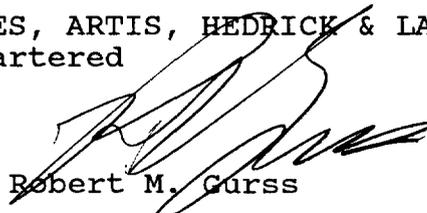
Enclosed for filing in the above-referenced docket are two copies of a letter from the Executive Director of the Association of Public-Safety Communications Officials-International, Inc. ("APCO") to the Chief of the Private Radio Bureau.

Please contact the undersigned if you have any questions.

Respectfully submitted,

WILKES, ARTIS, HEDRICK & LANE
Chartered

By:


Robert M. Gurss

Attorneys for APCO

Enclosures

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September 1, 1994

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Mr. Ralph Haller
Chief, Private Radio Bureau
Federal Communications Commission
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

RE: Public Safety Needs Study (Your Ref. No 7330-01/1700A3)

Dear Mr. Haller:

In response to your letter of April 5, 1994, APCO recently submitted a "Public Safety Spectrum Needs Analysis and Recommendation" to the Commission. A separate study was also submitted by the Public Safety Communications Council ("PSCC") (consisting of FCCA, AASHTO and IAFC/IMSA). APCO agrees with much of the information contained in the PSCC study, which further demonstrates the need for additional radio spectrum allocations for public safety.

However, PSCC also repeats its prior recommendation that applicants for the Local Government Radio Service be permitted to submit applications to any of the four public safety frequency coordinators. APCO strongly opposes this proposal, which is also contained in PSCC's Comments in the spectrum refarming proceeding (PR Docket 92-235). APCO's Reply Comments in that proceeding (filed July 30, 1993), at pages 13-14, explain that multiple coordinators for the Local Government Radio Service would result in inefficient and potentially inaccurate frequency coordination and higher fees. In contrast, APCO's current coordination of the Local Government frequencies has led to accurate, efficient, fair, and equitable distribution of channels to all applicants.

A copy of this letter has been submitted to the Secretary for filing in PR Docket 92-235. APCO looks forward to continued cooperation with the Commission on the public safety needs study and related matters.

Sincerely,

James R. Rand

cc: Richard DeMello