

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Replacement of Part 90 by Part 88 to Revise) PR Docket 92-235
the Private Land Mobile Radio Services)
and Modify the Policies Governing Them)

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Federal Communications Commission
Office of Secretary

To: Wireless Telecommunications Bureau

COMMENTS OF APCO
IN RESPONSE TO
PETITIONS FOR RECONSIDERATION AND CLARIFICATION

The Association of Public-Safety Communications Officials-International, Inc. ("APCO"), by its attorneys, hereby submits the following comments in response to various petitions for reconsideration and clarification of the Commission's Second Report and Order, FCC 97-61, released March 12, 1997, in the above-captioned proceeding.

APCO is the nation's oldest and largest public safety communications organization, with over 12,000 members involved in the management and operation of police, fire, emergency medical, local government, forestry conservation, highway maintenance, disaster relief and other public safety communications systems. APCO is a certified frequency coordinator for the Part 90 Police, Local Government, and 800 MHz Public Safety Pool channels.

Most of the issues raised in the petitions for reconsideration and clarification do not have a direct impact on public safety licensees. However, there are two issues raised in some of the petitions that require a brief response. First, are requests from the Alarm

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Industry Communications Committee (“AICC”) and the American Automobile Association (“AAA”) that the central station alarm frequencies (in the case of AICC) and auto emergency frequencies (in the case of AAA) be included within the Public Safety Pool. Second, are suggestions from several parties that the Commission modify the conditions that must be met before a system operating on frequencies below 470 MHz can be trunked.

I. The Public Safety Pool Should Not Be Expanded

APCO does not believe that either central station alarm or auto emergency frequencies should be part of the Public Safety Pool. However, APCO agrees that those services often have an important safety-related role, and would not object to either being treated in a manner similar to “public service” radio frequencies such as utility and railroad services. Such a result would be consistent with the recent Public Safety Wireless Advisory Committee (“PSWAC”) report.

PSWAC adopted the following definitions which were developed through extensive deliberations in the PSWAC Interoperability Subcommittee:¹

Public Safety: The public’s right, exercised through Federal, State or Local government, as prescribed by law, to protect and preserve life, property, and natural resources and to serve the public welfare.

Public Safety Services: Those services rendered by or through Federal, State, or Local government entities in support of Public Safety duties.

Public Safety Services Provider: Governmental and public entities or those non-governmental, private organizations, which are properly authorized by the appropriate governmental authority whose primary mission is providing Public Safety services.

¹ See PSWAC Final Report at 45.

Public Safety Support Provider: Governmental and public entities or those non-governmental, private organizations which provide essential public services that are properly authorized by the appropriate governmental authority whose mission is to support Public Safety services. This support may be provided either directly to the public or in support of Public Safety services providers.

Public Service: Those services provided by non-Public Safety entities that furnish, maintain, and protect the nation's basic infrastructures which are required to promote the public's safety and welfare.

Neither the central alarm systems nor auto emergency systems normally fall within any of the "Public Safety" categories. Neither are usually provided by governmental entities or private entities acting under governmental authority. Rather, alarm systems are usually businesses that provide optional security services on a commercial basis. Thus, central alarm frequencies, though given special consideration, have been part of the Business Radio Service. Similarly, auto emergency services such as AAA are providing an optional commercial roadside service, usually through for-profit service stations and towing firms. As such, these services should not be permitted unfettered access to scarce "Public Safety Pool" channels.

AAA also claims that auto emergency should be treated in the same fashion as Special Emergency licensees, who are permitted access to the Public Safety Pool. However, the Commission never included the Auto Emergency Radio Service as part of the Special Emergency Service, and there is no compelling reason to change that approach. Most Special Emergency operations are provided by governmental entities (beach patrols, school buses, etc.) or are private ambulance services that provide critical life-saving activities on a daily basis. While towing and roadside services provided

through AAA can also have an important safety-related function on occasion, that is not substantially different from many other private radio system operations, most of which have at least some safety-related purpose. That alone, however, is insufficient for those systems to qualify for the Public Safety Pool, which must be reserved for more critical governmental Public Safety activities.

II. The Commission Should Modify the Trunking Requirements

Several parties have sought reconsideration of the Commission's requirement that an applicant seeking authority to trunk a radio system operating below 470 MHz obtain concurrence from all co-channel and adjacent channel licensees within a 70 mile radius. They argue that the requirement is an unnecessary burden, and should be replaced by a signal overlap criterion. APCO agrees, and has previously discussed this issue with the Public Safety Communications Council ("PSCC," which includes each public safety coordinator) and Commission staff.²

Within the Public Safety Pool, APCO suggests that trunking should be conditioned on coverage/interference contours performed from the proposed trunked system's base station to those existing co-channel and adjacent channel systems that fall within a 113 km radius. Both systems' contours should not overlap in their respective service areas for the systems to co-exist without causing interference to each other. If the proposed system contours do overlap with the existing systems contours, the parameters (ERP, Antenna

² APCO is opposed to Ericsson's suggestion that concurrence should only be required from licensees constituting a simple majority of authorized co-channel and adjacent channel subscriber units. Under that scenario, the one licensee most likely to face severe interference from the trunked system could be simply outvoted. That approach might work for non-Public Safety channels, but it is entirely inappropriate where the lone dissenter is nevertheless providing communications for the protection of life and property.

Height, etc.) of the proposed system must be reduced to avoid interference. APCO, in conjunction with the PSCC, has developed and approved technical standards for this analysis, based on the recent work of the TR8.8 committee within the Telecommunications Industry Association. Those standards, which will facilitate faster and more efficient frequency coordination, are set forth in an attachment to these comments.

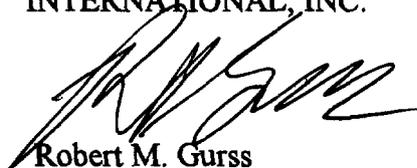
CONCLUSION

For the reasons stated above, the Commission should (1) not expand eligibility for the Public Safety Pool, and (2) modify the trunking criteria to reflect interference contours rather than arbitrary mileage separations.

Respectfully submitted,

ASSOCIATION OF PUBLIC-SAFETY
COMMUNICATIONS OFFICIALS-
INTERNATIONAL, INC.

By:



Robert M. Gurss
WILKES, ARTIS, HEDRICK & LANE,
Chartered
1666 K Street, N.W. #1100
Washington, D.C. 20006
(202) 457-7329

Its Attorney

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APCO's Recommendation on Trunking below 512 MHz

APCO, in conjunction with PSCC, developed and approved the following set of technical standards based on the TR8.8 document. This will facilitate a much faster and more efficient frequency coordination process for Conventional and Trunked Systems in VHF-High Band and UHF Band. The Coverage/Interference Values developed by APCO are as follows:

- 1) The Coverage/Interference Contour Values for protecting the co-channel users for Narrowband and Wideband Systems are:

VHF High Band---Coverage Contour= 37 dBu at 90%
Interference Contour= 12 dBu at 90%
Delivered Audio Quality (DAQ) of 4.0
Which is 25 dB Sinad for analog

UHF Band-----Coverage Contour= 39 dBu at 90%
Interference Contour= 14 dBu at 90%
Delivered Audio Quality (DAQ) of 4.0
Which is 25 dB Sinad for analog

- 2) The Adjacent Channel Coupled Power Ratio (ACCP) number for use in High Band for Adjacent Channel Frequency Coordination is:

	+/-7.5 Hz Spacing	+/-15 Hz Spacing
Wideband to Narrowband	10 dB	52 dB
Narrowband to Wideband	10 dB	52 dB
Wideband to Wideband	N/A	30 dB
Narrowband to Narrowband	27 dB	90 dB

- 3) The ACCP value for use in UHF Band for Adjacent Channel Frequency Coordination is:

	+/-12.5 Hz Spacing
Wideband to Wideband	N/A
Narrowband to Wideband	20 dB
Wideband to Narrowband	20 dB
Narrowband to Narrowband	40 dB

4) Co-channel Case:

- a) Perform coverage contour study of 12 dBu for VHF High band and 14 dBu for UHF band for the Proposed System.**
- b) Perform coverage contour study of 37 dBu for VHF High band and 39 dBu for UHF band for all the existing co-channel users.**
- c) Plot the contours of the proposed system and the existing systems. The contours should not overlap in their service areas for the systems to coexist without causing interference to each other.**

5) Adjacent Channel Case:

- a) Perform coverage contour study of 12 dBu for VHF High band and 14 dBu for UHF band for the proposed system by reducing the ERP by ACCP Value from the above two tables.**
- b) Perform coverage contour study of 37 dBu for the VHF High band and 39 dBu for the UHF Band for all the existing adjacent channel users.**
- c) Plot the coverage contours of proposed system and the existing adjacent channels systems. They should not overlap in their service areas for them not to interfere with each other.**

CERTIFICATE OF SERVICE

I, Jane Nauman, hereby certify that I have on this 19th day of June, 1997, caused copies of the foregoing Comments of APCO to be delivered via U.S. Mail, postage prepaid, to the following individuals at the addresses listed below:

Christopher D. Imlay, Esq.
Booth Freret Imlay & Tepper
1233 - 20th Street, NW, Suite 204
Washington, DC 20036

Lars-Goran Larsson, Esq.
Ericsson Inc.
1634 Eye Street, NW
Washington, DC 20006-4083

Marissa G. Repp, Esq.
Hogan & Hartson
555 Thirteenth Street, NW
Washington, DC 20004-1109

John A. Prendergast, Esq.
Blooston Mordkofsky Jackson & Dickens
2120 L Street, NW, Suite 300
Washington, DC 20037

Mark E. Crosby
Industrial Telecommunications Assn.
1110 N. Glebe Road, Suite 500
Arlington, VA 22201

Larry W. Strawhorn
American Trucking Associations, Inc.
2200 Mill Road
Alexandria, VA 22314

Jeffrey L. Sheldon, Esq.
UTC
1140 Connecticut Avenue, NW
Washington, DC 20036

Alan R. Shark
American Mobile Telecommunications
1150 - 18th Street, NW, Suite 250
Washington, DC 20036

William K. Keane, Esq.
Arter & Hadden
1801 K Street, NW, Suite 400K
Washington, DC 20006

Dennis C. Brown, Esq.
Brown and Schwaninger
1835 K Street, NW, Suite 650
Washington, DC 20006

Wayne V. Black, Esq.
Keller and Heckman
1001 G Street, NW, Suite 500 West
Washington, DC 20001

Jonathan L. Weil, Esq.
Hewlett-Packard Company
300 Minuteman Road
Andover, MA 01810


Jane Nauman