

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

RECEIVED

SEP 14 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of Parts 2 and 90 of the Commission's)
Rules to Allocate the 5.850-5.925 GHz Band to the) ET Docket No. 98-95
Mobile Service for Dedicated Short Range)
Communications of Intelligent Transportation)
Services)

To: The Commission

COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc. ("APCO"), hereby submits the following comments in response to the Commission's Notice of Proposed Rulemaking in the above-captioned matter, FCC 98-119, released June 11, 1998.

APCO is the nation's oldest and largest public safety communications organization. Most of its 13,000 individual members are state or local government officials involved in the management, design, and/or operation of police, fire, emergency medical, local government, highway maintenance, forestry conservation, disaster relief, and other public safety communications systems. APCO is certified by the Commission under Part 90 as a frequency coordinator for public safety radio channels.

[Handwritten signature]

The Commission is proposing an allocation of spectrum for use by Dedicated Short Range Communications (“DSRC”) for Intelligent Transportation Systems (“ITS”). As discussed in the Notice, such operations have a variety of safety related applications. For example DSRC, combined with other ITS technology, will allow traffic to be diverted to facilitate more rapid emergency vehicle response. Other potential ITS applications include incident detection and management systems to identify road hazards, automated roadside inspections, and collision avoidance systems.

Because of the significant public safety potential of ITS, APCO supports allocation of spectrum for DSRC and similar technology. While the spectrum proposed for DSRC is already used for other purposes, DSRC will have extremely limited range and is likely to be restricted to major highways. Nevertheless, the Commission should adopt rules to avoid any potential for harmful interference to public safety operations. A critical aspect of interference avoidance is frequency coordination. APCO is the FCC’s certified frequency coordinator for the majority of public safety radio frequencies, and is prepared to assist the Commission as necessary in any ITS related coordination activities.

Eventually, the public safety community, and perhaps the Commission, will also need to explore the impact of some ITS operations on Public Safety Answering Points (PSAPs) and related public safety communications facilities. Many of the proposed ITS technologies will necessarily involve interface with existing systems for receiving emergency calls and dispatching emergency personnel. APCO pledges to work with the ITS community on these issues as they evolve.

CONCLUSION

For the reasons discussed above, APCO supports the allocation of spectrum for DSRC.

Respectfully submitted,

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

By:



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

September 14, 1998