

**Before the
Federal Communications Commission
Washington, DC 20554**

In the matter of Request of)
ACD Telecom, LLC)
To be Certified as a Part 90 Frequency Coordinator) PS Docket No. 14-148
Of Public Safety Frequencies in the VHF and UHF)
Bands Below 512 MHz, 700 MHz narrowband,)
800 MHz NPSPAC and 800 MHz Public Safety)
Category Frequencies,)

To: Public Safety and Homeland Security Bureau

COMMENTS OF THE NORTHERN CALIFORNIA CHAPTER OF APCO.

The Northern California chapter of the Association of Public-Safety Communication Officials (APCO) would like to be of record as opposing the certification of ACD Telecom, LLC (ACD), as a frequency coordinator for 47CFR90.20 (public safety) frequencies. We note that the proponent is a privately owned, commercial firm, furnishing engineering and license preparation services. It is felt as such there may be a conflict of interest presented in coordinating self-generated products. Additionally this firm is not, as the other public safety coordinators are, a representative of a segment of actual public-safety users.

Should the Commission certify this firm as a frequency coordinator, there is a deep concern over the precedence of such leading to a plethora of similar firms also seeking coordination business as a for profit

endeavor. Such would totally lead to a multitude of conflicts and competition leading to diminishing the quality-of-service presently experienced by public safety entities.

Currently the public safety coordinators have set a fee schedule that provides for inter-service fee premiums. This is where a public safety applicant involves multiple frequencies in an application that involve other service coordinators. We question how this may be addressed where ACD is not a true representative of a specific service. ACD's coordination fees then would involve a greater billing to a client where all frequencies coordinated would involve elevated billings as inter-service fees would be involved. We ask if this would serve the public interest.

CONCLUSION

Therefore, for the reasons set forth above, the Commission must dismiss ACD's Request as it is clearly not representative of Public Safety frequency users.

Respectfully submitted,

/s/

John Batarseh,

President, Northern California chapter of APCO

By Preston Thomson, Director N APCO

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