

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 & Homeland Security Bureau

COMMENTS from Chris Kindelspire, Region 54 700MHz Chair

It has not been identified whether ACD has a Board of Advisors. If there is a Board of Advisors, do they represent the public safety community that ACD has requested to coordinate and have they been placed in their respective position by their peers?

If there is a Public Safety Group which ACD Telecom, LLC (“ACD”) represents, it is not identified within the ACD petition to the FCC.

Is the intention of this request to promote the FCC’s stance on competitiveness among the public safety coordinators by increasing the pool of coordinator options?

ACD is a commercial for-profit entity, unlike the existing public safety coordinators, which are not-for-profit. However, there is not an independent elected board to provide checks-and-balance. Granting coordinator status to ACD provides them the opportunity to use their coordination ability to gain customers. It further provides the possibility for manipulation of the coordination process in favor of their customers. ACD needs to have representation from Public Safety providing oversight from a

committee elected by their peers. What is ACD's proposal to provide neutral and unbiased frequency coordination for the public safety community? Will ACD suspend its consulting services to Public Safety clients or existing Public Safety customers to avoid potential conflicts of interest?

Will ACD join the existing recognized processes, and abide by the existing protocols of the PSCC and LMCC?

ACD provided contractual frequency coordination services to some public safety coordinators, and should that, in some way, influence or qualify them for FCC to approve ACD's petition? If this is the case, would other entities providing this service also be considered for coordinator status?

All 110 Regional 700 MHz and 800 MHz Committees, which have had their Plans approved by the FCC, perform frequency coordination tasks for every application they receive. Additionally, Regional Planning Committees should be given the same consideration as requested by ACD Telecom LLC for coordination of the 700 MHz and 800 MHz Public Safety planned spectrum. 700 MHz and 800 MHz Planning Committee Regions have volunteered their time providing pre-planning assistance, and performing coordination, for their respective peers for over twenty-five (25) years.

I do not agree with the statement that ACD's ability to provide specialized services that other engineering or consulting services cannot provide somehow qualifies them as a FCC coordinator. As referenced on page three (3), in the ACD filing, ACD stated another coordinator was necessary to reduce back log and delay in applications being processed and submitted to the FCC. ACD, in their current role, performing and submitting their engineering data to a coordinator for processing, benefits the existing process and helps expedite submission from the coordinator to the FCC.

With these items presented, ACD should not be considered for coordinator status by the FCC.



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