



EXECUTIVE DIRECTOR

Derek K. Poarch
poarchd@apcointl.org

December 22, 2014

HEADQUARTERS

J. Rhett McMillian, Jr. Building
351 North Williamson Boulevard
Daytona Beach, FL 32114-1112
386-322-2500

EXECUTIVE OFFICES

Gregory T. Riddle Building
1426 Prince Street
Alexandria, VA 22314
571-312-4400

www.apcointl.org

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: *Ex parte* Notification: PS Docket No. 14-148 and WP Docket No. 14-235

BOARD OF DIRECTORS
2014 – 2015

EXECUTIVE COMMITTEE

President

John Wright
rfanalyst@gmail.com

First Vice President

Brent Lee
w.brent.lee@gmail.com

Second Vice President

Cheryl J. Greathouse
cgreathouse@gpstc.org

Immediate Past President

Gigi Smith
gsmith@vecc9-1-1.com

East Coast Region

Richard C. Boettcher, RPL
James J. McFarland

Gulf Coast Region

Martha K. Carter, ENP
Matthew J. Stillwell, RPL, ENP

North Central Region

Robin Tieman, RPL
Holly E. Wayt, RPL, ENP

Western Region

Kimberly D. Burdick, RPL
Peggy A. Fouts, ENP

Commercial Advisory Council

Richard R. Solie

Dear Ms. Dortch:

On December 19, 2014, representatives of the Association of Public-Safety Communications Officials (APCO) International met with the following Commission staff to discuss the above-referenced proceedings concerning the requests of ACD Telecom, LLC (ACD) and Engineers Frequency Advisory Committee, LLC (EFAC) for certification as frequency coordinators: David Furth, Michael Wilhelm, Roberto Mussenden, and John Evanoff of the Public Safety and Homeland Security Bureau, and Scot Stone and Rodney Conway of the Wireless Telecommunications Bureau. Derek Poarch, Farokh Latif, Roger Wespe and the undersigned participated on APCO's behalf.

APCO explained the importance of the Commission's long-established "representativeness" requirement as applied to the certification of frequency coordinators, which APCO described in its previously filed comments and reply comments. APCO emphasized that representativeness remains especially important for public safety users where interference could disrupt emergency communications.

APCO distinguished its association of over 22,000 members as a non-profit governed by elected, volunteer members serving as officers and on the APCO Board of Directors, from both ACD and EFAC, which are for-profit entities governed by private owners. Accordingly, APCO explained that the representativeness requirement is met when an association or organization is governed by those it purports to represent, and has as its mission to serve those members.

APCO cautioned against opening up public safety frequency coordination to private enterprises that are not representative of public safety users, as such financially-motivated entities may value speed and profit margins over diligent and unbiased frequency coordination services.

Respectfully submitted,

/s/

Jeffrey S. Cohen
Chief Counsel, Law & Policy