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Dodge City Communications, Inc. ("Dodge City") wholly supports the request of the Engineers Frequency Advisory Committee, LLC ("EFAC") to become a Part 90 frequency coordinator for Private Land Mobile Radio ("PLMR") services.

The main thrust of previous opposition to new coordinators has been to argue that only not-for-profit organizations can effectively represent PLMR users. Conversely, the FCC, throughout the Telecommunications Act of 1996 has repeatedly encouraged competition. Docket 83-737 sets forth the FCC's requirements to become a frequency coordinator as follows: (a) representativeness of the users of the frequencies to be coordinated, (b) the entity's overall coordination plan, to include how frequency recommendations would be made in an unbiased and non-discriminatory way, (c) the entity's experience and technical expertise coordinating frequencies in the service and (d) its nationwide frequency coordination capability.

The FCC has never mandated that frequency coordinators be not-for-profit organizations. The FCC has never limited frequency coordinators to four. What the FCC has done is to mandate that organizations performing this task be competent as indicated in the four simple-to-understand requirements repeated in the immediately preceding paragraph.

If egregious errors in frequency coordination are indicators in whether an organization should be approved for this type of work, then the record stands clear on Blue Wing Services, TUSA Engineering and Shulman Rogers Gandal Pordy & Ecker, the three firms organized to make up the body of EFAC, who have never made such egregious errors in frequency coordination work they have performed.

In the matter of Puerto Rico State Police, [See FCC DA 14-1749, released December 4, 2014], the Commission orders modification proceedings to modify the subject Police agency's station WQSG942 by deleting the frequencies listed in Attachment I, Table A1 from the license. The Commission took this action to ensure compliance with its rules because APCO certified, incorrectly, "that the channels listed in the application were available" for licensing to the PR State Police, when in fact they were not available. Such error and sloppiness does not warrant that the FCC view them as a somehow superior technical frequency coordinator above EFAC; APCO is clearly not in accordance with frequency coordination requirements by submitting frequencies prohibited for use that would cause harmful electrical interference to co-channel operators. Yet APCO hails itself as more technically adept in the area of propagation and frequency analysis. EFAC employs the latest tools for frequency coordination and has represented well over a thousand organizations seeking interference-free operation of its Part 90 service.

In the above-described error, APCO attached a propagation contour study claiming that the 22 dBu contour would remain within Sprint's previous 22 dBu contour licensed under call sign WPDF797.

Dodge City recommends that incumbent frequency coordinators who continue to defy frequency coordination standards and procedures not be the standard bearers of who should and should not be approved as a frequency coordinator. Rhetorically, how can you make the laws when you break the laws?

The public and Part 90 users would derive much benefit in the rapid approval of EFAC as the newest and most error-free coordinator supporting the PLMR service.

Sincerely,

Andre M. Jones
President
Dodge City Communications, Inc.
A Service Disabled Veteran Owned Small Business