

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of Request of)
ENGINEERS FREQUENCY ADVISORY)
COMMITTEE, LLC)
To be Certified as a Part 90 Frequency Coordinator) PS Docket No. 14-235
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 by Stephen E. Rauter, Executive Director of the Western Will
County Communication Center (WESCOM), and APCO Illinois Chapter Member
and Board Member.**

1. FAILURE TO DEFINE WHICH PUBLIC SAFTEY GROUP IS INVOLVED: Section 332
of the 1934 Communication Act as amended permits the FCC to utilize frequency

coordination committees (*i.e.*, frequency coordinators) for coordinating and assigning frequencies in the private mobile radio services. If there is a Public Safety Group which ENGINEERS FREQUENCY ADVISORY COMMITTEE represents, it is not identified within the ENGINEERS FREQUENCY ADVISORY COMMITTEE petition to the FCC. “Representativeness” was a concept included in PR Docket No. 83-737 released May 15, 1986, which ENGINEERS FREQUENCY ADVISORY COMMITTEE failed to provide or define.

ENGINEERS FREQUENCY ADVISORY COMMITTEE does not appear to have a Board of Advisors who are Public Safety members or who represent any Public Safety interests, nor is the ENGINEERS FREQUENCY ADVISORY COMMITTEE executive board made up of Public Safety individuals.

It appears that ENGINEERS FREQUENCY ADVISORY COMMITTEE is a for-profit, commercial enterprise, and not a “not for profit” entity as compared to the other Public Safety associations which are presently certified as Public Safety frequency coordinators.

The only group represented by ENGINEERS FREQUENCY ADVISORY COMMITTEE are its customers, or customers of those commercial entities who are attempting coordinate spectrum for their customers. This would give the appearance of impropriety on its face, and would certainly not be an objective way to coordinate frequencies.

2. THE PRIMARY BENEFICIARY IS THE COORINATOR, NOT THE COORDINATED:

ENGINEERS FREQUENCY ADVISORY COMMITTEE could be very capable in doing the tasks they are contracted to perform for their customers, but being a certified coordinator would not provide the Public Safety Community, as a whole, any benefit from ENGINEERS FREQUENCY ADVISORY COMMITTEE becoming a certified coordinator. The primary beneficiary of their coordination work would be ENGINEERS FREQUENCY ADVISORY COMMITTEE itself.

3. PAST ACTION OF THE FEDERAL COMMUNICATION COMMISSION:

PR Docket No. 83-737, released May 15, 1986, had the following footnote:

*98. The primary factor supporting Comp Comm's proposal is its technical expertise in system design. Such technical expertise is a necessity in coordinating public land mobile radio systems because each system must be individually engineered to protect other licensees' service areas. In the private radio services, however, assignments are not based on predicted service area contours, but are either shared or assigned with a specific mileage separation. Coordinators in the private land mobile radio services must also have technical expertise since they may have to "engineer-in" systems when conditions warrant, and must always consider system parameters to minimize interference. However, there are factors other than technical issues that also must be considered in making private land mobile assignments. For example, **since frequencies may be shared, user compatibility is often an issue. All established user groups requesting to be coordinators in these pools have***

demonstrated the necessary technical expertise and capabilities.
We have repeatedly stated that the most important criterion in
choosing the coordinators is representativeness. In this case, the
user groups - NABER, APCO, and SIRSA - are most representative of
eligibles for these frequencies. They are endorsed by a broad cross
section of the users in the pool they wish to coordinate. (Emphasis
added.)

This footnote, as part of the broader action regarding frequency coordination within PR Docket No. 83-737, indicates that the FCC specifically considered a commercial engineering firm as a coordinator and rejected that option. Unless the Commission has subsequently decided to reverse that position, this footnote should be all the FCC needs to dismiss the ENGINEERS FREQUENCY ADVISORY COMMITTEE petition, or petitions of similar commercial, for-profit engineering firms that desire to become Public Safety frequency coordinators.

In conclusion, I find no benefit to Public Safety for the Commission to grant ENGINEERS FREQUENCY ADVISORY COMMITTEE's petition requesting certification as a Public Safety frequency coordinator.

Respectfully submitted,

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