

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

In the Matter of	)	
	)	
Recommended Nationwide Channels for	)	PS Docket No. 13-87
Deployable Trunked Systems in the 700 MHz	)	WT Docket No. 02-378
Narrowband Public Safety Band	)	

**COMMENTS OF APCO**

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”) hereby submits the following brief comments in response to the Commission’s *Public Notice*, DA 15-278, dated March 8, 2015, seeking comments in the above-captioned proceedings regarding recommended nationwide channels for deployable trunked systems in the 700 MHz Narrowband Public Safety Band.

Founded in 1935, APCO is the nation’s oldest and largest public safety communications organization. APCO is a non-profit association with approximately 20,000 members, most of whom are state or local government employees who manage and operate communications systems for police, fire, emergency medical, forestry conservation, highway maintenance, disaster relief, and other public safety agencies. APCO appears regularly before the Commission on a wide range of public safety communications issues, and is the largest FCC-certified frequency coordinator for Part 90 Public Safety Pool channels.

The Commission has adopted a *Report and Order* that, among other matters, releases the 700 MHz reserve channels (twenty four 12.5 channels) for General Use under the administration of the 700 MHz Band Regional Planning Committees (RPCs).<sup>1</sup> Within “T-Band markets,” all of the channels are for General Use, with priority access in channel assignments to be given to T-

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<sup>1</sup> Proposed Amendments to the Service Rules Governing Public Safety Narrowband Operations in the 769-775/799-805 MHz Bands, PS Docket No. 13-87, PS Docket No. 06-229, WT Docket No. 96-86, RM-11433, RM-11577, *Report and Order*, 29 FCC Rcd 13283 (2014).

Band incumbents (thus reducing somewhat the impact of the eventual loss of T-Band spectrum pursuant to current law). Elsewhere, RPCs are authorized to assign up to eight 12.5 kHz former reserve channels for deployable trunked systems, with the remainder designated for General Use. The Commission is now seeking comment on a channel plan submitted by the National Public Safety Telecommunications Council (NPSTC) and the National Regional Planning Council (NRPC) that identifies potential deployable trunked channels.

APCO participated in the development of the recommended channel plan, and fully supports its adoption by the Commission. However, it is important to reiterate that, as the Commission previously stated:

To the extent that an RPC designates fewer than eight channels for deployable trunked systems, or in the event that an RPC does not amend its Regional Plan within six months from the publication of this Report and Order in the Federal Register to include channels for deployable trunked systems, the channels shall revert to General Use without further action by the Commission.<sup>2</sup>

## CONCLUSION

Therefore, the Commission should proceed to adopt the recommended channel plan as proposed by NPSTC and NRPC, consistent with the *Report and Order*.

Respectfully submitted,

/s/

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April 2, 2015

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<sup>2</sup> *Id.* at ¶46.