



American Association of State Highway and Transportation Officials
Association of Public-Safety Communications Officials, International
Forestry Conservation Communications Association
International Municipal Signal Association

122 Baltimore Street, Gettysburg, Pennsylvania 17325

June 11, 2015

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

Re: Written Ex Parte Communication – WP Docket No. 15-32; RM-11572

Dear Ms. Dortch:

The Public Safety Communications Council (PSCC) is comprised of the four FCC-certified public safety frequency coordinators: the American Association of State Highway and Transportation Officials (“AASHTO”); the Association of Public-Safety Communications Officials (“APCO”); the Forestry Conservation Communications Association (“FCCA”); and, the International Municipal Signal Association (“IMSA”).

We are writing to respond to a particular matter raised by the Enterprise Wireless Alliance (EWA) in its Reply Comments submitted in this proceeding. EWA introduced a position at the end of the public comment period that is outside of the scope of the proceeding. Specifically, EWA stated that it “recommends that those coordinating 800 MHz applications be authorized to do so irrespective of the applicant’s eligibility.”¹

The Commission should ignore this portion of EWA’s Reply Comments as being outside the scope of the proceeding and thus procedurally infirm.

If the Commission were nevertheless to consider whether EWA may serve as a frequency coordinator for public safety applicants, PSCC reserves the right to more thoroughly rebut any such suggestion. However, PSCC can identify the following immediate concerns with permitting a non-public safety frequency coordinator to coordinate 800 MHz applications submitted by public safety applicants. Fundamentally, the premise of the EWA proposal – that coordination of B/ILT and public safety applications is essentially the same – is incorrect.

First, reciprocal analysis is not necessary as applied to an adjacent channel licensee when the applicant and the adjacent channel licensee are both public safety entities; only the applicant interference to incumbent service contour overlap needs to be considered. Second, if contour analysis fails, public safety coordinators will utilize TSB-88 methods. Third, a B/ILT coordinator would not be familiar with the public safety radio environment, e.g. voting receivers, tactical operations, and actual areas of operation.

¹ EWA Reply Comments at 5.

Accordingly, the FCC should dismiss EWA's proposal to coordinate 800 MHz applications submitted by public safety eligibles on procedural grounds, and even if considered, for the reason explained herein.

Sincerely,

Michelle Fink

Michelle Fink, Chair
Public Safety Communications Council