

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

In the Matter of)
)
Creation of Interstitial 12.5 kHz Channels in the) WP Docket No. 15-32
800 MHz Band Between 809-817/854-862 MHz) RM-11572

COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc. (APCO) hereby submits the following comments in response to a Public Notice requesting comments on the Land Mobile Communications Council’s (LMCC)¹ Proposed 800 MHz Interstitial Channel Interference Contours.²

Founded in 1935, APCO is the nation’s oldest and largest organization of public safety communications professionals. APCO is a non-profit association with over 25,000 members, primarily consisting of state and local government employees who manage and operate public safety communications systems – including Public Safety Answering Points (PSAPs), dispatch centers, emergency operations centers, radio networks, and information technology – for law enforcement, fire, emergency medical, 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 is proposing the creation of new, full power, interstitial 12.5 kHz offset channels in the 809-817/854-862 MHz bands. LMCC filed reply comments in the pending rulemaking proceeding, proposing interference contours to apply when stations of various

¹ APCO is a member of the LMCC.

² Wireless Telecommunications Bureau and Public Safety and Homeland Security Bureau Seek Comment on Land Mobile Communications Council’s Proposed 800 MHz Interstitial Channel Interference Contours, WP Docket No. 15-32 and RM-11572, *Public Notice*, DA 15-844 (rel. July 24, 2015).

modulation types are operated on interstitial channels (12.5 kHz spacing) adjacent to “standard” (25 kHz spacing) stations operating with various modulation types.

Prior to the development of the LMCC proposed contours, APCO commented that “[c]ontours used in the coordination process must be subject to independent testing and verification (e.g., by TIA).”³ While APCO appreciates the efforts of LMCC and believes that the proposed contours can be workable, they are untested. Thus, we would encourage manufacturers to submit test reports into the record to verify that no interference would result from new interstitial operations. Further, as APCO has said in its previous comments,⁴ and as noted by the Public Safety Communications Council (of which APCO is a member), APCO would support use of tile-based matrix studies using TSB-88 methods when the proposed operations of a public safety applicant fail a contour analysis.

CONCLUSION

APCO supports the proposed interference contours consistent with the comments herein.

Respectfully submitted,

APCO INTERNATIONAL

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³ Comments of APCO, WP Docket No. 15-32, May 11, 2015, at page 4.

⁴ *Id.*