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April 7, 2016

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

Re: PS Docket No. 13-87 – Proposed Amendments to the Service Rules
Governing Public Safety Narrowband Operations in the 769-885/799-805 MHz
Bands

Dear Ms. Dortch,

On April 5, 2016, Jeff Cohen, Mark Reddish, and Max Hsu of the Association of Public-Safety Communications Officials (APCO) International met with Jessica Almond, Legal Advisor to Chairman Wheeler, to discuss the above-captioned proceeding.

APCO addressed the Petition for Reconsideration filed by the Telecommunications Industry Association (TIA) requesting that the Commission not require Project 25 Compliance Assessment Program (CAP) certification for devices ahead of submission to the FCC for type acceptance. APCO believes that CAP approval should be required prior to type acceptance as an important step toward ensuring interoperability for land mobile radios.

APCO noted that the CAP Advisory Panel (formerly the CAP Governing Board) has matured significantly since TIA originally filed its Petition. The CAP Advisory Panel, with support from the Department of Homeland Security (DHS) and APCO, has established regular meetings and various conference calls, and has restructured its governance to raise the effectiveness of user input on the CAP's features and functionality requirements. Importantly, the CAP certification process has been streamlined, resulting in more timely approval for equipment that has passed CAP testing.

APCO noted that interoperability among land mobile radios is a fundamental requirement for effective emergency response and the safety of the general public and first responders. Although APCO prefers that the Commission require that equipment manufacturers obtain CAP certification prior to type acceptance, if the Commission permits devices to go through type acceptance prior to CAP certification, manufacturers should be prohibited from engaging in marketing activities, not just delivering equipment, until after CAP approval. This is critical for ensuring that the CAP program is able to fulfill its purpose of providing

emergency response agencies with evidence that the communications equipment they purchase meets P25 standards for performance, conformance, and interoperability.

Pursuant to Section 1.1206 of the Commission's rules, this letter is being filed electronically with your office.

Respectfully submitted,

/s/
Jeffrey S. Cohen
Chief Counsel

cc: (via email)
Jessica Almond