

CARROLL COUNTY MARYLAND

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COUNTY ATTORNEY'S OFFICE

Laurell E. Taylor
County Attorney

OCT 28 1998

FCC MAIL ROOM

October 27, 1998

VIA FEDERAL EXPRESS OVERNIGHT MAIL

Magalie Roman Salas, Esq.
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Re: In the Matter of Public Safety National Channels of Carroll County, Maryland
Licensed Under Call Signs WPIQ515 and WPPIU695
Washington, DC Metropolitan Area Regional Public Safety Plan (Region-20)
File Nos. 9709A007774 (WPIU695) and 9709A007775 (WPIQ515)
GN Docket No. 90-7

Gentlemen:

Enclosed please find Carroll County, Maryland's Reply Comments in Opposition to Petition for Revocation/Modification of Licenses in the above referenced matter. Kindly accept same for filing.

Very truly yours,


Timothy C. Burke
Assistant County Attorney

Encl.

c: Thomas J. Keller, Esq.
Lisa M. Higgonbotham, Esq.
Verner, Liipfert, Bernhard, McPherson & Hand
901 15th Street, NW, Suite 700
Washington, DC 20005

No. of Copies rec'd _____
List ABCDE _____



Magalie Roman Salas, Esq.
Federal Communications Commission
October 27, 1998
Page Two

c: D'wana R. Terry, Chief
John Clark, Deputy Chief
Public Safety and Private Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, NW, Room 8010
Washington, DC 20554

Howard S. Redman, Jr., Administrator
Office of Public Safety for Carroll County

(with enclosure)

TCB/th/H:\THAINES\FCCRegion20

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION
WIRELESS TELECOMMUNICATIONS BUREAU
PUBLIC SAFETY AND PRIVATE WIRELESS DIVISION
WASHINGTON, D.C. 20554

RECEIVED
OCT 28 1998
FCC MAIL ROOM

IN THE MATTER OF *

PUBLIC SAFETY NATIONAL CHANNELS OF *
CARROLL COUNTY, MARYLAND *

Licensed Under Call Signs *
WPIQ515 and WPPIU695 *

Washington, DC Metropolitan Area *
Regional Public Safety Plan *
(Region-20) *

File No. 9709A007774 (WPIU695)
File No. 9709A007775 (WPIQ515)

GN Docket No. 90-7

**REPLY COMMENTS IN OPPOSITION TO
PETITION FOR REVOCATION/MODIFICATION OF LICENSES**

Submitted by:

THE COUNTY COMMISSIONERS OF CARROLL COUNTY, MARYLAND
225 North Center Street
Westminster, Maryland 21157

THE COUNTY COMMISSIONERS OF CARROLL COUNTY, MARYLAND, a

body corporate and politic of the State of Maryland ("Carroll County"), pursuant to 47 CFR 1.405, hereby files the within Comments in Opposition to the Petition of the Commonwealth of Pennsylvania for revocation or modification of Carroll County's licenses.

1. The Petition for Revocation or Modification does not adequately set forth facts sufficient to merit modification or removal as set forth in 47 USC. 316, and, if granted, will result in a danger to life and property.

2. Additionally, the Commonwealth's Petition for Modification or Revocation should fail

for the reasons and arguments set forth in the Reply Comments of Region-20 Public Safety Review Committee dated September 18, 1998 filed in GN Docket Nos. 90-7 and 89-573, a copy of which is attached hereto and incorporated by reference.

Respectfully submitted,



Timothy C. Burke, Asst. County Attorney
225 North Center Street
Westminster, Maryland 21157
(410) 386-2030

Attorney for Carroll County, Maryland

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 27th day of October, 1998, a copy of the foregoing Reply Comments in Opposition to Petition for Revocation/Modification of Licenses was mailed, first-class, postage prepaid, to Thomas J. Keller, Esq., and Lisa M. Higginbotham, Esq., Verner, Liipfert, Bernhard, McPherson & Hand, Chartered, 901 15th Street, NW, Suite 700, Washington, DC, 20005, attorneys for the Commonwealth of Pennsylvania; and to D'wana R. Terry, Chief, and John Clark, Deputy Chief, Public Safety and Private Wireless Division, Wireless Telecommunications Bureau, Federal Communications Commission, 2025 M Street, NW, Room 8010, Washington, DC, 20554.



Timothy C. Burke
Assistant County Attorney

Our File No. ____ \TCB\th\H:\THAINES\FCCRegion20\10/27/98

REGION-20 PUBLIC SAFETY LEGISLATIVE/REGULATORY AFFAIRS COMMITTEE

**Before the
Federal Communications Commission
Wireless Telecommunications Bureau
Public Safety and Private Wireless Division
Washington, D.C. 20554**

In the Matter of)	
Washington, DC Metropolitan Area)	
Regional Public Safety Plan)	GN Docket No. 90-7
(Region-20))	
)	
Philadelphia Metropolitan Area)	
Regional Public Safety Plan)	GN Docket No. 89-573
(Region-28))	

**REPLY COMMENTS IN RESPONSE TO OPPOSITION TO
WRITTEN EX PARTE PRESENTATION:
RESPONSE STATEMENT**

Submitted by:

Region-20 Public Safety Review Committee
Legislative/Regulatory Affairs Committee
Dr. Michael C. Trahos, D.O., NCE, CET - Chairman
4600 King Street, Suite 6K
Alexandria, Virginia 22302-1249

September 18, 1998

I.

INTRODUCTION

1. Before the Federal Communications Commission (Commission) is submitted, pursuant to 47 CFR 1.405 (b), timely filed **REPLY COMMENTS** in response to comments filed

REGION-20 PUBLIC SAFETY LEGISLATIVE/REGULATORY AFFAIRS COMMITTEE

by the Commonwealth of Pennsylvania (Pennsylvania) in opposition to Region-20's **WRITTEN EX PARTE PRESENTATION: RESPONSE STATEMENT (RESPONSE STATEMENT)**¹.

2. Pennsylvania is requesting that the Commission, "on its own motion"², implement the equivalent of an injunctive **STAY** upon Carroll County, Maryland's (Carroll County) licenses. For the reasons infra, Pennsylvania's filing fails to meet the four prong test for a **STAY**.

II. REPLY COMMENTS

3. The four prong test for issuance of a **STAY** was set forth by the United States Court of Appeals for the District of Columbia Circuit in *Virginia Petroleum Jobbers Association v. Federal Power Commission*³, as modified in *Washington Metropolitan Transit Commission v. Holiday Tours*⁴. Under that test, a **STAY** is warranted if the movant can demonstrate that: (1) it is likely to prevail on the merits; (2) it will suffer irreparable harm, absent a stay; (3) other interested parties will not be harmed if the stay is granted; and (4) the public interest would favor a grant of the stay.⁵ As stated in paragraph 2 supra, Pennsylvania's filing fails this test.

¹ **WRITTEN EX PARTE PRESENTATION: RESPONSE STATEMENT**, GN Docket Nos. 90-7 & 89-573, Region-20 Public Safety Review Committee, August 21, 1998.

² **COMMONWEALTH OF PENNSYLVANIA OPPOSITION TO WRITTEN EX PARTE PRESENTATION: RESPONSE STATEMENT**, GN Docket Nos. 90-7 & 89-573, September 3, 1998, Page 3.

³ **VIRGINIA PETROLEUM JOBBERS ASSOCIATION v. FEDERAL POWER COMMISSION**, 104 U.S. App. D.C. 106, 259 F.2d 921, 925 (D.C. Cir. 1958).

⁴ **WASHINGTON METROPOLITAN TRANSIT COMMISSION v. HOLIDAY TOURS**, 182 U.S. App. D.C. 220, 559 F.2d 841 (D.C. Cir. 1977).

⁵ **Ibid.**, at 843.

REGION-20 PUBLIC SAFETY LEGISLATIVE/REGULATORY AFFAIRS COMMITTEE

4. An injury qualifies as “irreparable harm” only if it is “both certain and great; it must be actual and not theoretical.”⁶ Pennsylvania asserts that “the Commonwealth now faces interference to its communications system from Carroll County’s operations”⁷ Pennsylvania submits, as attachments, copies of Carroll County’s licensing data currently on file with the Commission. However, Pennsylvania failed to submit qualitative and quantitative engineering data, with contour maps, showing evidence of “irreparable harmful interference” to its system. As a result, Pennsylvania’s filing lacks the “proof indicating that the harm [it alleges] *is certain to occur* in the near future.”⁸ Therefore, Pennsylvania’s submission fails the second prong test for irreparable harm.

5. Pennsylvania notes that it submitted opposition comments, on February 28, 1996, in response to Region-20’s Plan Amendment filing of November 25, 1994.⁹ However, Pennsylvania fails to note the extensive *Reply Comments* submitted by Region-20 on March 22, 1996, which responded to Pennsylvania’s, et. al., comments.¹⁰ These *Reply Comments* clearly refute the allegations made by Pennsylvania in its February 28, 1996 submission and for which continue to be assert in its September 3, 1998 filing. Therefore, Pennsylvania’s submission fails the first prong test of prevailing on the merits of the case.

⁶ **WISCONSIN GAS COMPANY v. FERC**, 758 F.2d 669, 675 (D.C. Cir. 1985).

⁷ **Ibid.**, at Footnote 2, Page 2.

⁸ **Ibid.** at Footnote 6 (Emphasis added).

⁹ **Ibid.**, at Footnote 2, Page 4. **See also Attachment A.**

¹⁰ **REPLY COMMENTS IN RESPONSE TO ADDENDUM TO THE PETITION TO AMEND REGION-20 PUBLIC SAFETY COMMUNICATIONS PLAN**, GN Docket No. 90-7, March 22, 1996. **See also Attachment B.**

REGION-20 PUBLIC SAFETY LEGISLATIVE/REGULATORY AFFAIRS COMMITTEE

6. Pennsylvania fails to note that its present submission constitutes its third filing in opposition to Region-20's Plan Amendments. On May 14, 1997, Pennsylvania submitted its second set of opposition comments focusing on the issue of Carroll County's system extending beyond the 3-mile boundary of Region-20¹¹ in apparent non-compliance with the Region-20 Plan.¹² On May 27, 1997, Region-20 filed extensive *Reply Comments* in response thereto.¹³ In these *Reply Comments*, Region-20 notes that Carroll County's system exceeds the 3-mile out-of-boundary rule of the Region-20 Plan because Carroll County fire rescue companies have "a first response obligation and are first due for incidents within its adjacent Pennsylvania counties" as a result of legally binding *Memorandums of Understanding* between Carroll County and these adjacent Pennsylvania counties.¹⁴

7. If the Commission were to grant Pennsylvania's request that Carroll County be forced to modify its existing system to comply with the 3-mile out-of-boundary limitation rule, then ironically, the Commonwealth of Pennsylvania would be placing its own citizens in jeopardy. Therefore, Pennsylvania's submission fails the forth prong test in that their demands would *not* be in the public interest.

¹¹ **LETTER**, From Mr. Donald Appleby to Mr. Steve Souder, May 14, 1997. See also Attachment C.

¹² **Ibid.**, at Footnote 2, Page 8.

¹³ **REPLY COMMENTS**, GN Docket No. 90-7, May 27, 1997. See also Attachment D.

¹⁴ **Ibid.**, at Page 2.

REGION-20 PUBLIC SAFETY LEGISLATIVE/REGULATORY AFFAIRS COMMITTEE

8. Pennsylvania requests that the Commission not grant “unconditional” approval of the Region-20 amendment.¹⁵ Commission failure to unconditionally remove all the contingencies from its **ORDER** of December 9, 1996¹⁶, will result in Region-20 being unable to allocate spectrum to public-safety entities intra-regionally and approve adjacent inter-regional coordination requests. Therefore, Pennsylvania’s submission fails the third prong test by causing harm to other interested public-safety parties to these proceedings.

III. CONCLUSION

9. Region-20 hereby submits these **REPLY COMMENTS** which address the allegations made by Pennsylvania in opposition to the Region-20 Plan Amendments. Its submission fails the four prong test for the Commission to issue an injunctive **STAY** against Carroll County.

10. With the submission of these **REPLY COMMENTS**, the **RESPONSE STATEMENT** of August 21, 1998 and the **EX PARTE PRESENTATION** of January 30, 1997, Region-20 hereby fulfills the requirements of the conditional acceptance **ORDER**.

11. Region-20 requests Commission issuance of an unconditional **MEMORANDUM OPINION AND ORDER** acknowledging the acceptance of the Region-20 filings and the removal of all contingencies from the **ORDER** of December 9, 1996.

¹⁵ **Ibid.**, at Footnote 2, Page iii.

¹⁶ **ORDER**, GN Docket Nos. 90-7 & 89-573, DA 96-2066, December 9, 1996.

REGION-20 PUBLIC SAFETY LEGISLATIVE/REGULATORY AFFAIRS COMMITTEE

12. Commission issuance of an unconditional **MEMORANDUM OPINION AND ORDER** in this matter is appreciated by Regions-20 and its constituents, and is in the **public interest.**

Respectfully submitted,



Dr. Michael C. Trahos, D.O., NCE, CET
Chairman - Region-20 Public Safety RPRC
Legislative/Regulatory Affairs Committee

MCT/mct

REGION-20 PUBLIC SAFETY LEGISLATIVE/REGULATORY AFFAIRS COMMITTEE

IV. CERTIFICATE OF SERVICE

I, Dr. Michael C. Trahos, do hereby certify that a copy of this **WRITTEN EX PARTE PRESENTATION** was sent by First Class United States Mail to the parties listed below on the day and date first aforementioned.

1. Ms. Magalie R. Salas - Secretary
Federal Communications Commission
1919 M. Street, N.W. - Room 222
Washington, DC 20554
2. Mr. John Clark - Deputy Chief
Public Safety and Private Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M. Street, N.W. - Room 8010
Washington, DC 20554
3. Ms. Kathryn Hosford
Public Safety Liaison Officer
Public Safety and Private Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M. Street, N.W. - Room 8010
Washington, DC 20554
4. Mr. Steve H. Souder - Chairman
Region-20 Public Safety Regional Plan Review Committee
Arlington County (VA) Emergency Communications Center
1400 North Uhle Street, 5th Floor
Arlington, VA 22201-9995
5. Mr. Alan T. Kealey - Vice-Chairman
Region-20 Public Safety Regional Plan Review Committee
State of Maryland Department of Budget and Management
Office of Information Technology
45 Calvert Street
Annapolis, MD 21401

REGION-20 PUBLIC SAFETY LEGISLATIVE/REGULATORY AFFAIRS COMMITTEE

6. Dr. Michael C. Trahos, D.O., NCE, CET - Chairman
Region-20 RPRC Legislative/Regulatory Affairs Committee
4600 King Street, Suite 6K
Alexandria, VA 22302-1249
7. Mr. Richard R. Reynolds - Chairman
Region-28 Public Safety Planning Update Committee
Office of Telecommunications Management
State of Delaware
801 Silver Lake Boulevard
Dover, DE 19904-2460
8. Mr. Norman R. Coltri, P.E. - Vice-Chairman
Region-28 Public Safety Planning Update Committee
New Jersey State Police
Box 7068, Number 2 Trooper Drive
West Trenton, NJ 08628
9. Mr. Don Appleby - Project Manager
Governor's Office Administration
State of Pennsylvania
1 Technology Park
Harrisonburg, PA 17110
10. Mr. W. Michael Trupman, Esquire
Mr. Lawrence W. Lewis, Esquire
Deputy Attorney Generals
Department of Justice
State of Delaware
820 North French Street, 6th Floor
Wilmington, DE 19801
11. Mr. M. Jay Groce, III - Deputy Director
Chester County Department of Emergency Services
601 Westtown Road, Suite 12
West Chester, PA 19382

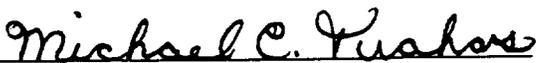
REGION-20 PUBLIC SAFETY LEGISLATIVE/REGULATORY AFFAIRS COMMITTEE

12. Mr. Frank W. Stoda - Senior Engineer
Radio Engineering and Services Branch
Network Services Division
Department of Information Technology
County of Fairfax (VA)
3613 Jermantown Road
Fairfax, VA 22030

13. Col. Carl A. Williams - Superintendent
New Jersey State Police
P.O. Box 7068
West Trenton, NJ 08628

14. Mr. Ali Shahnami
APCO AFC, Inc.
2040 South Ridgewood Avenue
South Daytona, FL 32119

Respectfully,


Michael C. Trahos
Dr. Michael C. Trahos, D.O., NCE, CET
Chairman - Region-20 Public Safety RPRC
Legislative/Regulatory Affairs Committee

ATTACHMENT A



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF GENERAL SERVICES
HARRISBURG

February 28, 1996

RECEIVED

FEB 29 1996

DOCKET FILE COPY DUPLICATE FCC MAIL ROOM

William Caton
Acting Secretary
Federal Communications Commission
1919 M Street, NW Room 222
Washington, DC 20554

Re: Public Notice No. DA 96-158, Amendment to Maryland, Washington, D.C.,
and Northern Virginia (Region 20) Public Safety Plan, General Docket 90-7

Dear Mr. Caton:

The Commonwealth of Pennsylvania hereby submits the following comments in response to the Commission's Public Notice for Amendment to Region 20's Public Safety Plan in the above referenced proceeding.

The Commonwealth of Pennsylvania is a Commission licensee of radio frequencies in the 821 to 869 MHz Public Safety Band, and is in the process of implementing a statewide 800 MHz trunked radio system.

We request the FCC to reject the proposed Region 20 Public Safety Plan on the grounds that it will cause radio interference to Public Safety frequencies licensed to Pennsylvania in Regions 28 and 36. It is apparent that Region 20 has taken little or no action to identify or preclude such interference.

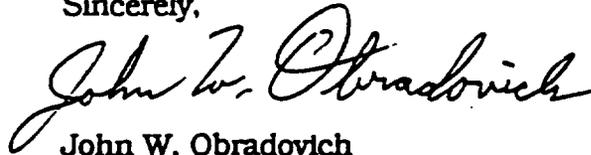
There are ten Pennsylvania counties in Region 28 within 50 miles of the Maryland border and four more are within 70 miles. Additionally, there are seventeen counties in Region 36 within 50 miles of Maryland, plus five more within 70 miles. The Commonwealth of Pennsylvania has a vital interest in protecting the 800 MHz frequencies that are licensed for Public Safety in each of these counties.

In addition to the channel conflicts identified in Region 28 in recent comments to the FCC by the Chairman of Region 28, the State of Delaware, and the New Jersey State Police, the Commonwealth of Pennsylvania will also be affected by potential co-channel and adjacent channel conflicts in Region 36. For example, the proposed channels 606 in Maryland's Allegany County and 619 in their Washington County are already licensed in nearby Greene and Washington Counties in Pennsylvania. It

appears that other conflicts will also be caused by Region 20's proposed changes, but we have not been provided access to specific coordinates and other details for technical evaluation.

The Commonwealth of Pennsylvania agrees with and strongly supports the recent correspondence and comments by the Chairman of Region 28, the State of Delaware, and also the New Jersey State Police concerning the proposed Amendment of the Region 20 Plan, General Docket No. 90-7. In particular, we request that the details of any proposed changes to the Region 20 Plan must be coordinated in advance with all surrounding Regions before any action is taken.

Sincerely,

A handwritten signature in cursive script that reads "John W. Obradovich". The signature is written in black ink and is positioned above the typed name and title.

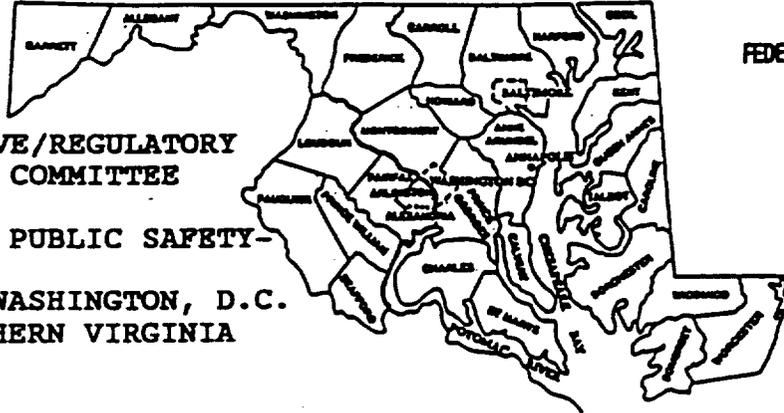
John W. Obradovich
Telecommunications Manager
Automated Technology Acquisition Office
2221 Forster Street, Room G-6
Harrisburg, PA 17125
Telephone: (717) 787-1459

ATTACHMENT B

RECEIVED

MAR 22 1996

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY



LEGISLATIVE/REGULATORY
AFFAIRS COMMITTEE
-REGION-20 PUBLIC SAFETY-
MARYLAND, WASHINGTON, D.C.
AND NORTHERN VIRGINIA

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Public Safety Radio)
Communications Plan for) GN Docket No. 90-7
- REGION-20 -)
Maryland, Washington, D.C.,)
and Northern Virginia)

REPLY COMMENTS IN RESPONSE TO ADDENDUM TO THE
PETITION TO AMEND REGION-20 PUBLIC SAFETY COMMUNICATIONS PLAN

Submitted by:

Region-20 Public Safety Review Committee
Legislative/Regulatory Affairs Committee
Dr. Michael C. Trahos, D.O., NCE, CET - Chairman
4600 King Street, Suite 4E
Alexandria, Virginia 22302-1213

March 22, 1996



MICHAEL C. TRAHOS, D.O.
GENERAL MEDICINE/FAMILY PRACTICE

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)
)
Public Safety Radio)
Communications Plan for) GN Docket No. 90-7
- REGION-20 -)
Maryland, Washington, D.C.,)
and Northern Virginia)

REPLY COMMENTS IN RESPONSE TO ADDENDUM TO THE
PETITION TO AMEND REGION-20 PUBLIC SAFETY COMMUNICATIONS PLAN

Submitted by: Region-20 Public Safety Review Committee
Legislative/Regulatory Affairs Committee
Dr. Michael C. Trahos, D.O., NCE, CET - Chairman
4600 King Street, Suite 4E
Alexandria, Virginia 22302-1213

Date: March 22, 1996

I. INTRODUCTION

1. Before the Federal Communications Commission (Commission) is an ADDENDUM (ADDENDUM) to the PETITION TO AMEND THE REGION-20 PUBLIC SAFETY COMMUNICATIONS PLAN (AMENDMENT PETITION) submitted November 25, 1994.

2. Pursuant to the authority given by the Commission under the Report and Order in General Docket No. 87-112 1/, the Region-20 Public Safety Planning Committee was created to address the future communications needs and concerns of the PSRS users for Region-20. The obligations of that Committee included the submission to the Commission of a Region-20 Public Safety Radio Communications Plan (Region-20 Plan) 2/ and establishment of a Region-20 Public Safety Review Committee (Committee) to oversee its implementation.

3. This Committee, representing the PSRS/governmental constituents for Region-20, hereby submits, pursuant to 47 CFR 1.405, the following timely filed REPLY COMMENTS to the ADDENDUM to the AMENDMENT PETITION to the Region-20 Plan.

II.

REPLY COMMENTS

4. On November 25, 1994, this Committee submitted an AMENDMENT PETITION to modify the Region-20 Plan, reflecting the changes in the frequency matrix resulting from the closure of Region-20's second filing window and non-substantive editorial corrections.3/

5. On January 25, 1996, this Committee submitted an ADDENDUM to the AMENDMENT PETITION having addressed the Commission's concerns regarding the Region-20 Plan and AMENDMENT PETITION.4/ On February 12, 1996, the Commission issued a PUBLIC NOTICE 5/ inviting comments and replies on the submitted ADDENDUM/AMENDMENT PETITION.

6. When the PUBLIC NOTICE was issued, it was noted that the Commission had previously entertained and adopted prior amendments to the Region-20 Plan. In so doing, the Commission was giving due notice to all potential commenters that any comments submitted must be in response to the current pending amendments and not in response to previously adopted amendments.

7. In response to the PUBLIC NOTICE, the Commission received timely filed comments from the Chester County [PA] Department of Emergency Services (Chester County) 6/, Region-28 Planning Update Committee (Region-28) 7/, State of Delaware Office of Information

Services - Telecommunications Management (Delaware) 8/ and Commonwealth of Pennsylvania Department of General Services (Pennsylvania) 9/, and late filed comments from the New Jersey State Police (New Jersey) 10/. These opposition comments raise issues for which this Committee now responds to infra.

8. As noted in paragraph 3 supra, the currently proposed Region-20 Plan amendments are for changes resulting from the conclusion of Region-20's second filing window and the successful processing of all pending applications thereto. The applications processed followed the clearly defined Region-20 Plan co-channel and adjacent channel protection criteria 11/, resulting in no harmful interference to Region-28.

9. During the second filing window, four entities applied and were allocated channel assignments. These entities were (1) Alexandria City, VA, (2) Carroll County, MD, (3) Manassas City, VA and (4) Prince William County, VA. Their specific channel assignments are listed in Appendix I of the ADDENDUM Region-20 Plan. Of these entities, only Carroll County, MD is in any reasonable proximity to cause concern for Region-28 and Region-36.

10. Carroll County, MD lies adjacent, along the Central Southern Pennsylvania border, to Regions 28 and 36. The frequencies allocated to Carroll County, MD, as a result of the

second filing window, were channels 686, 690, 693, 706, 709, 711, 720, 748.

11. Chester County and New Jersey state that Region-20's frequency matrix changes, as a result of the second filing window closure, will affect Region-28.^{12/} Chester County further asserts that these changes will cause "harmful interference to our [Chester County] existing operations, as well as operations in the State of Delaware, City of Philadelphia, State of New Jersey, and Commonwealth of Pennsylvania" ^{13/} as a result of allocated adjacent channels in the Northern Maryland area.^{14/}

12. Region-28 and Delaware claim that the proposed second filing window Region-20 Plan amendments will cause "direct co-channel and adjacent channel interference" to Region-28 licensees.^{15/} Region-28 states that conflicts exist between the Region-20 Plan amendments and specifically the "State of Delaware, The City of Philadelphia, PA, The County of Chester, PA, The PA State Police, and the NJ State Police."^{16/} Delaware further contends second filing window problems between "the State of Delaware and proposed channel assignment to the State of Maryland - Northeast, Baltimore City and Anne Arundel County".^{17/}

13. Pennsylvania states that they will be affected by "potential co-channel and adjacent channel conflicts in

Region-36."18/ They further assert that the nearby Pennsylvania Counties of Greene and Washington will be affected by the "proposed channels 606 in Maryland's Allegany County and 619 in their Washington County (Maryland)".19/

14. Chester County 20/, Region-28 21/, Delaware 22/ Pennsylvania 23/ and New Jersey 24/ each list channels they feel will be interfered with. These accusations are made without the submission of qualitative or quantitative engineering data supporting any degree of supposed harmful interference as a result of the second filing window frequency assignments, and in particular those channel assignments made to Carroll County, MD, as noted in paragraph 10, supra.

15. What each of these commenters has failed to realize is that all Region-20 co-channel or adjacent channel frequency assignments made along the Maryland/Pennsylvania and Maryland/Delaware borders, and they claim are in supposed conflict as noted in paragraphs 11, 12, and 13 supra, were done either in the original Region-20 Plan 25/ or with the closure of the first filing window 26/. The frequencies these commenters have listed have no interaction with the second filing window frequency assignments noted in paragraph 10, supra. If these commenters were concerned about possible interference to frequencies from prior

adjacent region assignments, they should have been voice during the previous amendment submission proceedings before the Commission.

16. Be that as it may and for the sake of completeness, Region-20 has reviewed these supposed claims of harmful interference. This Committee is perplexed in determining how a 5 dBu (0.35 uv) signal strength contour 27/ terminating at Region-20's Northern Maryland border with Region-28's Southern Pennsylvania border will cause harmful interference in the Commonwealth of Pennsylvania or in the distant non-adjacent State of New Jersey, as claimed.28/ Though Delaware correctly notes that the "proposed assignments may not pose a problem if the systems are properly designed"29/, the preceding observation suggests that Chester County, Region-28, Pennsylvania, and New Jersey lack an understanding of inter-regional frequency coordination processes. Furthermore, had all these commenters voiced their concerns in the previous Region-20 proceedings, this Committee is confident that the Commission would have found their accusations to be unfounded and invalid.

17. Chester County and New Jersey note that "Region-20 has chosen not to participate with the voluntary APCO regional plan allocation database."30/ (Emphasis added) This is not the case.

18. When the Planning Committees of the various regions were in their infancy stages, assistance was provided by APCO, and in particular CET, Inc., in the development of multi-inter-regional frequency matrixes to be used by Regional Planning Committee to form the foundation for frequency distributions within their respective regions. The CET, Inc. frequency matrix (CET sort), or alterations/variations thereto, were, as Chester County and New Jersey correctly note, voluntary in their use and not mandated by the Commission.

19. Region-20 has elected to use actual predicted signal strength contours, for co-channel and adjacent channel separation assignments, and not a fixed mileage separation model, as apparently used in Region-28. We have used the voluntary CET sort as the foundation and have proceeded forth with this Committee's primary purpose of maximizing frequency reuse and spectrum efficiency, of the 821-824/866-869 MHz band, within Region-20 in a dynamic process.

20. Chester County and New Jersey assert that "Region 20 appears to be philosophically opposed to coordinating their plan revision with surrounding Regions."^{31/} This is not true.

21. On January 11, 1996, this Committee submitted to the Commission a LETTER AND WRITTEN EX PARTE PRESENTATION (EX PARTE)

addressing all the issues regarding the supposed inter-regional frequency coordination issues between Region-20 and Region-28.^{32/} We do not feel it necessary to reiterate that entire EX PARTE in these REPLY COMMENTS. We do, however, request that the Commission review the EX PARTE prior to their issuance of an ORDER in this proceeding.

22. We do wish to further note that since the submission of the EX PARTE, Region-20 has continued to request information from Region-28 regarding technical information, their recently adopted plan amendments and a courtesy copy of their updated plan ^{33/} in our continued efforts to coordinate with our northern/eastern neighbors. To date, the information requested has not been received.

23. Chester County and New Jersey state that Region-20's plan revisions "should be coordinated with surrounding Regions as detailed in General Docket 88-476 at para 13."^{34/} GN Docket No. 88-476 deals with the adoption of the New York Metropolitan Area Region-8 Public Safety Plan.^{35/} As Region-8 is a non-adjacent Region, this Committee sees no reason to coordinate with non-adjacent Regions prior to submitting Region-20 Plan amendments for Commission adoption.

24. Pennsylvania states, and as also supported by other opposition commenters, that "any proposed changes to the Region 20 Plan must be coordinated in advance with all surrounding Regions". (Emphasis added) 36/ As elaborated in the LETTER AND WRITTEN EX PARTE PRESENTATION and ADDENDUM filings to the Commission, Region-20 has cooperated with our surrounding Regional neighbors when Region-20 Plan amendments affect inter-regional coordination issues.

25. Yet, ironically, in 1993 when a major inter-regional frequency coordination change to the Region-28 Plan channel allotment matrix was proposed 37/, Region-28 never attempted to notify or acquire Region-20's coordination or concurrence prior to it being filed with the Commission. This Committee therefore views Region-28's actions versus rhetoric as contradictory and not conducive to good inter-regional relations.

III.

CONCLUSION

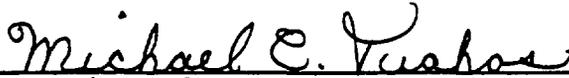
26. Pursuant to the authority under General Docket Nos. 87-112 and 90-7, this Committee submitted the ADDENDUM, having addressed the Commission's concerns regarding the Region-20 Plan and AMENDMENT PETITION.

27. In response to the Commission's PUBLIC NOTICE, opposition comments were filed by Chester County, Delaware, New Jersey, Pennsylvania, and Region-28. It is apparent that these commenters failed to adequately review the entire Region-20 GN Docket No. 90-7 Commission maintained cumulative record. These comments were submitted without supporting engineering documentation to substantiate the accusations made and are without merit. Had these commenters reviewed the GN Docket No. 90-7 record prior to comment submission, they would have recognized that their comments lacked forethought and insight.

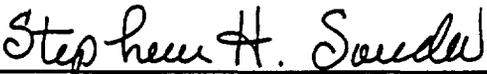
28. Despite the adversity expressed in the opposition comments submitted, it is Region-20's intent to continue to work with our adjacent Regions. Only in this way can we all maximize the efficient use of the 821-824/866-869 MHz spectrum and provide the best possible rendition and delivery of Public Safety services to the public.

29. With the submission of these REPLY COMMENTS, this Committee firmly believes that any and all issues contrary to the submitted ADDENDUM/AMENDMENT PETITION have been fully addressed. This Committee therefore respectfully requests swift Commission adoption of the submitted ADDENDUM, with its attached amended Region-20 Plan. This long overdue adoption is appreciated by this Committee and Region-20, and is in the public interest.

Respectfully submitted,



Dr. Michael C. Trahos, D.O., NCE, CET
Chairman - Region-20 Legislative/
Regulatory Affairs Committee



Mr. Stephen H. Souder
Chairman - Region-20 Regional Plan
Review Committee

IV.

FOOTNOTES

- 1/ REPORT AND ORDER, GN Docket No. 87-112, FCC 87-359, Paragraph 4.
- 2/ WASHINGTON, D.C. METROPOLITAN AREA - REGION 20, GN Docket No. 90-7, DA 90-28, January 17, 1990.
- 3/ PETITION TO AMEND REGION-20 PUBLIC SAFETY COMMUNICATIONS PLAN, GN Docket No. 90-7, November 25, 1994, in general.
- 4/ ADDENDUM, Region-20 Plan, GN Docket No. 90-7, January 25, 1996, in general.
- 5/ PUBLIC NOTICE, GN Docket No. 90-7, DA 96-158, February 12, 1996.
- 6/ COMMENTS, Chester County Department of Emergency Services, GN Docket No. 90-7, February 27, 1996, in general.
- 7/ COMMENTS, Region-28 Planning Update Committee, GN Docket No. 90-7, February 28, 1996, in general.
- 8/ COMMENTS, State of Delaware Office of Information Services - Telecommunications Management, GN Docket No. 90-7, February 28, 1996, in general.
- 9/ COMMENTS, Commonwealth of Pennsylvania Department of General Services, GN Docket No. 90-7, February 28, 1996, in general.
- 10/ COMMENTS, New Jersey State Police, GN Docket No. 90-7, March 4, 1996, in general.
- 11/ ADDENDUM, Region-20 Plan, GN Docket No. 90-7, January 25, 1996, Plan at Sections 20 through 27, Pages 20 through 24.
- 12/ COMMENTS, Chester County Department of Emergency Services, GN Docket No. 90-7, February 27, 1996, at Paragraph 2, Page 2 and Paragraph 5, Page 3.
COMMENTS, New Jersey State Police, GN Docket No. 90-7, March 4, 1996, at Paragraph 3, Page 2 and Paragraph 5, Page 3.
- 13/ Ibid., at Paragraph 3, Page 3.
- 14/ Ibid.

- 15/ COMMENTS, Region-28 Planning Update Committee, GN Docket No. 90-7, February 28, 1996, at Paragraph 3, Page 1; COMMENTS, State of Delaware Office of Information Services - Telecommunications Management, GN Docket No. 90-7, February 28, 1996, at Paragraph 3, Page 1.
- 16/ COMMENTS, Region-28 Planning Update Committee, GN Docket No. 90-7, February 28, 1996, at Paragraph 3, Page 1.
- 17/ COMMENTS, State of Delaware Office of Information Services - Telecommunications Management, GN Docket No. 90-7, February 28, 1996, at Paragraph 3, Page 1.
- 18/ COMMENTS, Commonwealth of Pennsylvania Department of General Services, GN Docket No. 90-7, February 28, 1996, at Paragraph 4, Page 1.
- 19/ Ibid.
- 20/ COMMENTS, Chester County Department of Emergency Services, GN Docket No. 90-7, February 27, 1996, at Paragraph 3, Page 3.
- 21/ COMMENTS, Region-28 Planning Update Committee, GN Docket No. 90-7, February 28, 1996, Attachment Page 2.
- 22/ COMMENTS, State of Delaware Office of Information Services - Telecommunications Management, GN Docket No. 90-7, February 28, 1996, at Paragraph 3, Page 1.
- 23/ COMMENTS, Commonwealth of Pennsylvania Department of General Services, GN Docket No. 90-7, February 28, 1996, at Paragraph 5, Page 1.
- 24/ COMMENTS, New Jersey State Police, GN Docket No. 90-7, March 4, 1996, at Paragraph 3, Page 2.
- 25/ ORDER, GN Docket No. 90-7, DA 90-507, 5 FCC Rcd 1984 (1990), March 26, 1990.
- 26/ ORDER, GN Docket No. 90-7, DA 94-131, 9 FCC Rcd 703 (1994), February 10, 1994.
- 27/ ADDENDUM, Region-20 Plan, GN Docket No. 90-7, January 25, 1996, at Paragraph 8.
- 28/ COMMENTS, New Jersey State Police, GN Docket No. 90-7, March 4, 1996, at Paragraph 3, Page 2.

- 29/ COMMENTS, State of Delaware Office of Information Services - Telecommunications Management, GN Docket No. 90-7, February 28, 1996, at Paragraph 4, Page 2.
- 30/ COMMENTS, Chester County Department of Emergency Services, GN Docket No. 90-7, February 27, 1996, at Paragraph 5, Page 3. COMMENTS, New Jersey State Police, GN Docket No. 90-7, March 4, 1996, at Paragraph 5, Page 2.
- 31/ Ibid.
- 32/ LETTER AND WRITTEN EX PARTE PRESENTATION, Region-20 Public Safety, General Docket 90-7, Reply Refer 2000F/KSH, January 5, 1996, filed January 11, 1996.
- 33/ LETTERS, Stephen H. Souder - Chairman, Region-20 to Richard Reynolds - Chairman, Region-28, February 14, 1996, Received FCC Office of the Secretary, February 20, 1996, and March 7, 1996, Received FCC Office of the Secretary, March 11, 1996.
- 34/ COMMENTS, Chester County Department of Emergency Services, GN Docket No. 90-7, February 27, 1966, at Paragraph 4, Page 2. COMMENTS, New Jersey State Police, GN Docket No. 90-7, March 4, 1996, at Paragraph 4, Page 2.
- 35/ ORDER, GN Docket No. 88-476, DA 89-533, May 12, 1989.
- 36/ COMMENTS, Commonwealth of Pennsylvania Department of General Services, GN Docket No. 90-7, February 28, 1996, at Paragraph 5, Page 2.
- 37/ PUBLIC NOTICE, GN Docket No. 89-573, DA 93-936, July 21, 1993.

ATTACHMENT C



Post-It® brand fax transmittal memo 7671

of pages > 4

To <i>Steve Souder</i>	From <i>Don Appleby</i>
Co.	Co.
Dept.	Phone # <i>717-772-8000</i>
Fax #	Fax #

GOVERNOR'S OFFICE of ADMINISTRATION
Radio Project Development Office
One Technology Park
Harrisburg, Pennsylvania 17110-2913

May 14, 1997

Steve Souder
Chairman, Region 20 Planning Committee
Emergency Communications Center
1400 North White Street, 5th Floor
Arlington, Virginia 22201-9998

RE: Order DA 96-2066

Dear Mr. Souder,

The Commonwealth of Pennsylvania received, via the Region 28 Planning Committee, copies of maps purporting to show coverage contours from the proposed Carroll County licenses in your Window 2 request. The maps were received on May 6, 1997, and were received without any technical detail or supporting information whatsoever, in contradiction to the proposed inter-regional coordination agreement we all worked so diligently to draft. The maps are useless for coordination and planning purposes without supporting technical detail, especially as we understand that Carroll County's system design has substantially changed since the dates indicated on the maps. Also, the expected information regarding other proposed allocations in your Window 2 was not received at all.

In the interest of continuing with the process, we have examined the maps and submitted them to our engineering consultant for evaluation. Further, we conducted extensive field strength measurements of Carroll County's operations under their conditional licenses in the adjacent Commonwealth counties. The preliminary analyses lead us to the following conclusions:

1. All proposed Carroll County assignments except channel 711 interfere with existing Commonwealth licensed and coordinated areas of operation. In our engineers' opinion, the extreme severity and degree of interference from most of the assignments precludes technical adjustments which could result in satisfactory shared use of the assignments. The engineers have also studied Carroll County's license data, and conclude that the EIRPs and antenna heights in use are far in excess of the minimum required to provide reliable simulcast coverage within that county and within the 3-mile 40 dBu contour surrounding it.
2. The maps clearly indicate that Region 20 considered coverage requirements far in excess of the 3 mile 40-dBu allowance permitted without adjacent region and licensee approval when considering Carroll County's request, as you acknowledged during our second meeting on February 24, 1997.
3. The maps and actual measurements clearly indicate that Region 20's assertion in your Window 2 amendment that no proposed station would exceed a 5 dBu contour beyond Region 20's borders is grossly inaccurate. This assertion was the basis for Region 20's submittal of license requests without prior coordination. These inaccuracies call into question all other technical assumptions by Region 20 contained in your Window 2 filing, and is part of the basis for our insistence that all proposed stations in the amendment be subject to review. As the Commission recognized at paragraph 14 of the Order, your amendment indicated in paragraph 32 that Region 20 would ensure protection of adjacent regions by requiring Region 20 applicants to "engineer their systems such that their 5 dBu co-channel and 25 dBu adjacent channel contour did not exceed beyond Region 20's boundaries."

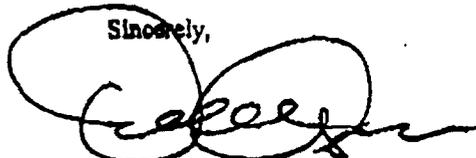
The Commonwealth remains deeply concerned by the continuing lack of cooperation afforded it by your Region with respect to this Docket during 135 days of discussion. We continue to object to your proposed Window 2 assignments. We object to your Committee's failure to provide any real technical information regarding any proposed assignments, and to its timing in supplying inaccurate and outdated data too late in the extension period to afford proper evaluation. We also have not received transcripts of any of the joint meetings after the first, despite your assurance that such transcripts would be made available and placed on the record.

I have also received a copy of a letter from Alan T. Kealey to Norman Coltri dated May 9, 1997, in which Mr. Kealey makes reference to his expectation of receiving technical data from the Commonwealth of Pennsylvania. We regard the discussions between Mr. Coltri and Mr. Kealey as attempts to establish a productive dialog, not as negotiations on behalf of the Commonwealth of Pennsylvania. As we are a party of record to this proceeding, we expect any substantial discussion regarding the proceeding that impacts Commonwealth licenses and/or coordination to include us directly. Any requests for provision of technical data should be directed to me, and will be accommodated insofar as we feel such requests are appropriate within the scope of the Commission's Order and in the context of Mr. Horowitz' March 24, 1997 letter of clarification.

The Commonwealth of Pennsylvania remains committed to reaching a resolution of the present issue. I have received no contact from Carroll County directly, despite calls to Mr. Rodman, and no valid technical data from Region 20, despite Mr. Kealey's assertions to the contrary. Lacking any evidence of good faith in negotiations from either Region 20 or Carroll County, we are left with the conclusion that other avenues of resolution may be more appropriate. It is clear to us that further extensions or delays in implementation of the remedies specified in the Commission's Order would serve no purpose, other than to continue to harm the Commonwealth's efforts to proceed with its own system.

Please contact me directly if you or your committee develop any genuine interest in negotiation.

Sincerely,



Donald Appleby
Project Manager

cc: Parties of Record

Enclosure (Region 20 maps)

CERTIFICATE OF SERVICE

I, Debra Oswald, certify that I have, on this 15th day of May 1997, sent by facsimile (without enclosure) and by regular United States mail, copies of the foregoing letter to:

Steve Soudo
Chairman, Region 20
Arlington County, VA, Emergency Communications Center
1400 North Nile Street, 5th Floor
Arlington, Virginia 22201-9998
fax = 703-358-3989

Richard Reynolds
Chairman, Region 28 Planning Update Committee
Office of Telecommunications Management
841 Silver Lake Blvd.
Dover, Delaware 19904-2460
fax = 302-739-9642

W. Michael Tupman
Lawrence W. Lewis
Deputy Attorneys General
Department of Justice
820 North French St, 6th Floor
Wilmington, Delaware
fax = 302-577-6630

M. Jay Grace III
Deputy Director
Chester County Department of Emergency Services
601 Westtown Road, Suite 12
West Chester, Pennsylvania 19382
fax = 610-341-5050

Frank W. Stoda
Radio Engineering and Services Branch
Network Services Division
Department of Information Technology
County of Fairfax
12000 Government Center Parkway, Suite 417
Fairfax, Virginia 22035-3931
fax = 703-324-3931

Col. Carl A. Williams
Superintendent, New Jersey State Police
P.O. Box 7068
West Trenton, New Jersey 08628
fax = 609-530-0718

Den Phythyon
Chief, Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, N.W., Room 5002
Washington, D.C. 20554

David Horowitz
Chief, Private Radio Division
Federal Communications Commission
2025 M Street, N.W., Room 8010
Washington, D.C. 20554

Bruce Franca
Deputy Chief, Office of Engineering and Technology
Federal Communications Commission
2025 M Street, N.W., Room 416
Washington, D.C. 20554

Kathryn Hosford
Private Radio Division
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M Street, N.W., Room 8002
Washington, D.C. 20554
fax = 202-416-2643


Debra Osswald

ATTACHMENT D

REGION-20 REGIONAL PLAN REVIEW COMMITTEE

Coltri that you were to reciprocate, in a timely manner, with the transmittal to Region-20 via Mr. Coltri with the same technical information (contour maps) for the Pennsylvania system.²

In Paragraph 4 of your letter, you implied that the agreement to exchange information was between the Vice-Chairman of Regions-20 & 28, and is not applicable to you, despite the fact that you are Chairman of Region-36 and a member of Region-28, and whom has repeatedly made an issue of the Carroll County frequency assignments. You further state that any transmittal of technical data for the Pennsylvania system will be accommodated for only when you unilaterally "feel such requests are appropriate".

Such an attitude continues to bolster Region-20's long developing opinion that of Region-28, and its members, are unwilling to participate in the resolution of *inter*-regional problems. To date, Region-20 is still not in receipt of the reciprocal information in the required time³, a clear renegeing of the agreement between the Regional Vice-Chairman.

You additionally state in your opening paragraph that the information you received from Mr. Coltri was useless because of the substantial change to the Carroll County system since the dates indicated on the contour maps. Be advised that the changes to Carroll County's system was in the decrease in radiated emissions, further reducing any perceived potential interference to the yet to be constructed or operational Pennsylvania system.

Regarding your third paragraph, with sub-paragraphs 1, 2 & 3, you have overlooked a crucial fact; that of Carroll County Fire Rescue companies having a first response obligation and are first due for incidents within its adjacent Pennsylvania counties.

There has existed for many years MEMORANDUM OF UNDERSTANDINGS (MOUs) between Carroll County and these adjacent Pennsylvania counties. To be able to fulfill its first response/first due obligations, it was necessary for Carroll County to apply for, and Region-20 granted, extended coverage area into these Pennsylvania counties. Region-20 attempted to seek concurrence with the Region-36 committee. However at that time, for reasons unknown to Region-20, there was no active Region-36 committee, notwithstanding the Federal Communications Commission's (Commission) urging that all Regions be served by active committees. Let us further not forget that only recently did you notify all parties of record that you, as Chairman, had re-activated the Region-36 committee.

² Ibid, Paragraph 1.

³ ORDER, GN Dockets 90-7 & 89-573, DA 97-887, April 29, 1997 [45 Day Filing Deadline Extension Order].

REGION-20 REGIONAL PLAN REVIEW COMMITTEE

Your second paragraph additionally implies that Carroll County's emissions are not authorized to extend beyond the 3-mile limit of their county border. Is it therefore to be interpreted that you believe Carroll County should **not** comply with the existing MOU's and **not** respond, and/or be first due, into its adjacent Pennsylvania counties? If you do believe this to be so, then someone must invoke State Government *preemption* over the affected County Governments and revoke the MOUs!

Are you so empowered by the Commonwealth of Pennsylvania with the authority necessary to invoke such State *preemption* over County affairs? If so, you are hereby requested to submit to Region-20 and Carroll County documentation of such credentials and authority. If, upon further legal review, you are not empowered with such State authority, then your objection to Carroll County's system emissions extending into the Commonwealth of Pennsylvania, with the knowledge and agreement of these adjacent counties, is **moot**.

Lastly, in your third paragraph, you continue to formally object to the Region-20 second filing window assignments. Pursuant to the Commission's rules and regulations, formal and legal objection to these assignments could only have been made during the Comment/Reply Comment period post issuance of the Commission PUBLIC NOTICE (FCC DA 96-158 February 12, 1996)⁴ regarding Region-20's Addendum filing, which clearly listed the Carroll County frequencies assigned as the result of the second filing window, or during the 30 day window-of-opportunity to file a *PETITION FOR RECONSIDERATION* of the December 9, 1996 conditional **ORDER**⁵. As there was no filing of opposition specific to the Carroll County assignments, the Commission conditionally accepted the Region-20 second filing window. Your continued formal objections to the Carroll County frequency assignments is thus **legally moot!**

In closing, you have eluded in your last paragraph that you may need to seek other "avenues of resolution". Be advised that Region-20 is also fully prepared to pursue this matter by all means and "avenues of resolution" appropriate.

Respectfully,

Stephen H. Souder

Mr. Stephen H. Souder
Chairman, Region-20 Public Safety
Regional Plan Review Committee

SHS/MCT/mct
Attachment: Certificate of Service

⁴ 47 CFR 1.405

⁵ 47 CFR 1.429

REGION-20 REGIONAL PLAN REVIEW COMMITTEE

CERTIFICATE OF SERVICE

I, Stephen H. Souder, do hereby certify that a copy of this **WRITTEN EX PARTE PRESENTATION** was sent by First Class United States Mail to the parties listed below on the day and date first aforementioned.

1. Mr. William F. Caton - Secretary
Federal Communications Commission
1919 M. Street, N.W. - 2nd Floor
Washington, DC 20554
2. Mr. Don Phythyon - Chief
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M. Street, N.W., Room 5002
Washington, DC 20554
3. Mr. David E. Horowitz - Chief
Private Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M. Street, N.W., Room 8010
Washington, DC 20554
4. Ms. Kathryn Hosford
Public Safety Liaison Officer
Private Wireless Division
Wireless Telecommunications Bureau
Federal Communications Commission
2025 M. Street, N.W., Room 8002
Washington, DC 20554
5. Mr. Bruce Franca - Deputy Chief
Office of Engineering and Technology
Federal Communications Commission
2025 M Street N.W., Room 416.
Washington, DC 20554

REGION-20 REGIONAL PLAN REVIEW COMMITTEE

6. Mr. Steve H. Souder - Chairman
Region-20 Public Safety Regional Plan Review Committee
Arlington County (VA) Emergency Communications Center
1400 North Uhle Street, 5th Floor
Arlington, VA 22201-9995

7. Mr. Alan T. Kealey - Vice-Chairman
Region-20 Public Safety Regional Plan Review Committee
State of Maryland Department of Budget and Management
Office of Information Technology
45 Calvert Street
Annapolis, MD 21401

8. Dr. Michael C. Trahos, D.O., NCE, CET - Chairman
Region-20 RPRC Legislative/Regulatory Affairs Committee
4600 King Street, Suite 6K
Alexandria, VA 22302-1213

9. Mr. Richard R. Reynolds - Chairman
Region-28 Public Safety Planning Update Committee
Office of Telecommunications Management
State of Delaware
801 Silver Lake Boulevard
Dover, DE 19904-2460

10. Mr. Norman R. Coltri, P.E. - Vice-Chairman
Region-28 Public Safety Planning Update Committee
New Jersey State Police
Box 7068, Number 2 Trooper Drive
West Trenton, NJ 08628

11. Mr. Don Appleby - Project Manager
Radio Project Development Office
Governor's Office Administration
Commonwealth of Pennsylvania
One Technology Park
Harrisonburg, PA 17110-2913

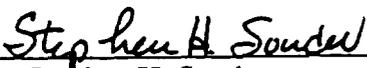
REGION-20 REGIONAL PLAN REVIEW COMMITTEE

12. Mr. W. Michael Trupman, Esquire
Mr. Lawrence W. Lewis, Esquire
Deputy Attorney Generals
Department of Justice
State of Delaware
820 North French Street, 6th Floor
Wilmington, DE 198 ___
13. Mr. M. Jay Groce, III - Deputy Director
Chester County Department of Emergency Services
601 Westtown Road, Suite 12
West Chester, PA 19382
14. Mr. Howard Redman - Secretary
Region-20 Public Safety Regional Plan Review Committee
Administrator - Carroll County Office of Public Safety
225 North Center Street
Westminster, MD 21157
15. Mr. Frank W. Stoda - Acting Manager
Radio Engineering and Services Branch
Network Services Division
Department of Information Technology
County of Fairfax (VA)
12000 Government Center Parkway, Suite 417
Fairfax, VA 22035-0006
16. Col. Carl A. Williams - Superintendent
New Jersey State Police
P.O. Box 7068
West Trenton, NJ 08628

REGION-20 REGIONAL PLAN REVIEW COMMITTEE

17. Mr. Ali Shahnami
APCO AFC, Inc.
2040 South Ridgewood Avenue
South Daytona, FL 32119

Respectfully,



Mr. Stephen H. Souder
Chairman - Region-20 Public Safety
Regional Plan Review Committee



PUBLIC NOTICE

74469

Federal Communications Commission
1919 M St., N.W.
Washington, D.C. 20554

News media information 202 / 418-0500
Fax-On-Demand 202 / 418-2830
Internet: <http://www.fcc.gov>
<ftp.fcc.gov>

Released: June 4, 1997

Ex Parte Presentations and Post-Reply Comment Period Filings in Permit-But-Disclose Proceedings

The following is a list of ex parte presentations and Post-Reply Comment Period Filings received by the Secretary of the Commission on or before May 30, 1997. Copies of these written presentations and memoranda reporting oral presentations, if they relate to docket proceedings, are available for inspection and copying in the appropriate docket in the FCC Reference Center (Room 239, 1919 M St., N.W., Washington, D.C.) which is open Monday through Friday, 9:00 AM to 4:30 PM; or, if they relate to non-docket proceedings, in the appropriate bureau. Also, the duplicating contractor, ITS, Inc., located in Room 246, as well as offices at 2100 M St., N.W. Suite 140, Telephone Number (202) 857-3800, will provide, for a fee, copies of these materials. For additional information, contact Barbara Lowe at (202) 418-0310.

Date Received	Oral or Written Presentation by:	Oral or Written Presentation to:	Docket No.
5/29	Ameritech	Secretary	<u>CC 85-229</u> Rates for Competitive Common Carrier Services <u>CC 90-623</u> Computer III Remand Proceeding <u>CC 95-20</u> Computer III Further Remand
5/30	Federal-State Joint Board	Secretary	<u>CC 87-339</u> Impact of Joint Board Decisions
5/30	Region-20 Regional Plan Review Committee	Secretary	<u>GEN 90-7</u> Washington, DC Metro Area Public Safety Plan