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November 2, 2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: WT Docket 99-87

Dear Ms. Salas:

This is to inform the Commission that the attached letter is being delivered this morning to Mr. Thomas Sugrue, Chief of the Wireless Telecommunications Bureau, and other Commission personnel indicated therein.

Please contact the undersigned should the Commission have any questions.

Respectfully submitted,



Robert M. Gurss
Counsel for APCO

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November 1, 2000

Thomas Sugrue, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: WT Docket 99-87

Dear Mr. Sugrue:

Glen Nash, President-Elect of the Association of Public-Safety Communications Officials-International, Inc. ("APCO"), and I recently spoke with members of the Commission staff regarding APCO's concern with a proposal in the above-captioned proceeding to permit Business and Industrial/Land Transportation Pool licensees in the 800 MHz band to convert their PMRS licenses to CMRS licenses. As I indicated in an *ex parte* letter regarding those conversations, the conversion to CMRS could lead to a significant increase in the use of cellular architecture on channels adjacent to the 800 MHz Public Safety Pool. There has recently been numerous instances in which 800 MHz public safety mobile and portable units operating at the fringe of their own service area have been subjected to interference from nearby low level "cell sites" operating on adjacent frequency bands. APCO's concern is that the proposed expansion of CMRS operations in the 800 MHz channels could greatly increase the potential for such interference to public safety systems. Therefore, if the Commission moves in that direction, it must take steps to minimize the threat to public safety operations.

For example, APCO suggests that the Commission require that a CMRS licensee coordinate with adjacent channel public safety licensees in the same geographic area before it modifies a Business or Industrial/Land Transportation channel for cellular-type operation. Such coordination could lead to system design changes or other steps to reduce the potential for interference. APCO is also participating in a task force with commercial 800 MHz licensees, equipment manufacturers, and trade associations to address the overall interference issue. APCO anticipates that the task force will soon complete recommendations that include additional steps that can be undertaken to avoid harmful interference in the 800 MHz band.

Mr. Thomas Sugrue
November 1, 2000
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Please contact me should the Commission have any questions regarding this matter.

Respectfully submitted,



Robert M. Gurss
Counsel for APCO

cc: Clint Odom, Office of Chairman Kennard
Adam Krinsky, Office of Commissioner Tristani
Mark Schneider, Office of Commissioner Ness
Bryan Tramont, Office of Commissioner Furchtgott-Roth
Peter Tenhula, Office of Commissioner Powell
Kathleen O'Brian Ham, Wireless Telecommunications Bureau
Office of the Secretary