

April 29, 2002

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Marlene H. Dortch, Esquire
Secretary
Federal Communications Commission
445 - 12th Street, S.W.
Washington, DC 20554

RE: RM-10077 Modification of Sec. 90.20(c) of the Commission
Rules for Channels below 470 MHz

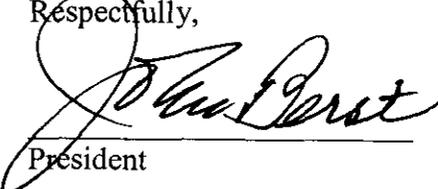
Dear Ms. Dortch:

APCO has been conducting a letter writing campaign in an effort to persuade the Commission to act on its pending petition for rulemaking in the above-entitled matter. The Forestry Conservation Communications Association, Inc. (FCCA), one of the Commission's public safety coordinators, deems this ill-advised and as stated in its comments filed herein is compelled to oppose this petition in order to protect its various critical state-wide VHF mobile systems from destructive interference.

Our position is based on recent examples of what can happen when another coordinator puts an unrelated user on one of these state-wide frequencies. These state-wide systems using repeaters are used in critical areas to fight wildfires when they occur. Any interference from a misplaced licensee can wipe out the state systems and create a dangerous situation for firefighters. We have found in the past that in such cases it is a difficult and lengthy process to remove the offenders and in the meantime our system is impaired and those depending on it threatened.

Because of these concerns, we must urge no further action on this proposal.

Respectfully,


President

cc: Mr. Thomas Sugrue, Chief
Wireless Telecommunications Bureau

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