State of Delaware
Department of Technology & Information
Telecommunications Technology Section
William Penn Building
801 Silver Lake Boulevard
Dover, DE 19904-2407

December 1, 2002

Secretary
Federal Communications Commission
445 12th St. SW
Washington, DC 20554

RE: RM-10077, Modification of Section 90.20 (c) of the Commission's Rules to Permit Use of Any Certified Public Safety Frequency Coordinator for Channels below 470 MHz

To Whom It May Concern:

The following comments are based upon my 16 plus years experience as a public safety communications professional, APCO AFC Local Advisor and Chairman of NPSPAC Region 28.

Since 1997 when the Commission consolidated the twenty PLMR services below 512 MHz into two pools, the FCC has allowed the coordination of the previous Local Government Radio Service channels by all four coordinators. In over five years since the Commission took that action there have been few, if any, issues regarding this policy. It is working now and should continue to work in the future for both these channels as well as the other frequencies. As the Commission notes in WT Docket NO. 02-285 RM-10077, II, 5., "The Commission determined that the introduction of competition among frequency coordinators in the former Local Government Radio Service should promote lower coordination costs and foster better service to the public." This has worked in part due to the Commission's requirement that the various coordinators share information by the establishment of a notification system to prevent conflicts between applications with other coordinators.

Those opposing this action argue that they are the only ones to understand the unique needs of their constituents. While on the surface this has some merit, it is not a compelling enough argument to deny APCO as a coordinator in the other services. With the current state-of-the-art for information sharing this argument just doesn't hold up. This is evident with the current notification system and information sharing that is currently done among the coordinators. The Commissions own Universal Licensing

System is a model of information sharing and an important resource for applicants as well as coordinators. Additionally, after September 11, 2001, public safety communications cuts across those traditional lines of responsibility. It is becoming apparent that there is more need for a "public safety communications system", as opposed to a police radio system and a fire radio system, and an emergency management agency radio system, and a highway maintenance radio system. Public safety agencies are working more cooperatively and closely than ever before to include issues of communications. Unified systems are not only desirable but necessary given the current responsibilities placed upon local governments regarding protection of the public. As a public safety communications professional, I can personally testify to the fact that cooperation among various entities within a jurisdiction and among neighboring jurisdictions is at an all time high. With "interoperability" being a key word in the public safety communications community, I can assure you that cooperation in all matters of public safety communications cuts across all of those various areas of responsibility.

The Commission allows competitive frequency coordination in bands other than those below 470 MHz. This applies to both 700 MHz and 800 Mhz. From my perspective as an APCO AFC Local Advisor and a public safety communications professional, this has not caused irreparable harm to the users of those bands. There are no additional interference issues or are there, "errors and coordination interference, which would jeopardize lives and property" as those opposing this rule making would have you believe.

Some argue that the current method of sharing shows that the existing system works and needs no change. I would argue that since the existing sharing arrangement works, lets streamline it and make it more equitable, more available and more cost effective than it is now. Opening up coordination below 470 MHz to all coordinators can accomplish this.

The Commission notes that there are differences between operations below 512 MHz and those at frequencies above that. Specifically, the Commission notes that frequencies at 800 MHz have provisions for exclusivity and below 512 MHz they are shared. While there is this distinction in the philosophy of use of radio frequencies between the two bands, in practice there is little difference. A public safety agency can no more tolerate harmful interference below 512 MHz than it can at 800 MHz. Therefore, despite the philosophical difference there is no difference from an operational perspective.

On the issue of "warehousing" or "hoarding" of frequencies, giving all coordinators equal access to coordinate all frequencies would help to eliminate or reduce such practices, if they now exist.

Some argue against opening coordination to all based on the fact that there are regional or statewide plans that others may not be familiar with. Again, with the existing ability to share information electronically and instantaneously this issue evaporates. Yes, there are plans but they don't present an insurmountable obstacle. Sharing of those plans with

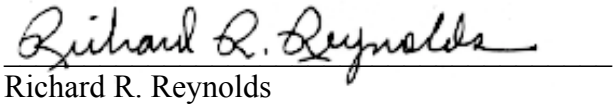
others so that frequency coordination can be done in compliance with a preexisting plan is necessary and can be accomplished.

Will opening coordination to all coordinators create irresolvable interference issues? No. Will there be interference issues? Yes, of course there will be, however, there are a number of existing methods and practices currently in place to resolve these issues. For example, there is an existing APCO/FCC MOU that addresses interference resolution, there is the Commission itself with its Enforcement Bureau and, as in many cases, there is mutual cooperation among licensees. To address interference it would seem that an additional layer of bureaucracy is neither wanted nor justified in this case.

Opening up coordination to all is not only desirable but also necessary. There is no "magic" formula that one coordinator holds that allows him alone to coordinate within his service. Nor is there any "magic" associated with the art of frequency coordination itself. Coordination is based upon sound engineering principals, information sharing, computer modeling, experience and good common sense.

No one coordinator holds a monopoly on any one of these principles. Competitive coordination will provide faster service, reduced costs, more choices and a single point of contact for licensees. I would urge the Commission to act favorably upon this NPRM for the benefit of all concerned.

Respectfully Submitted,



Richard R. Reynolds
Telecommunications Technologist
State of Delaware
Department of Technology and Information
801 Silver Lake Blvd.
Dover, DE 19904-2407