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December 10, 2003

The Honorable Michael Powell
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: WT Docket 03-187

Dear Mr. Chairman:

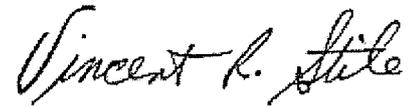
The Commission is currently conducting an inquiry regarding the impact of radio communications towers on migratory birds. While that subject is beyond APCO's area of expertise, we are concerned that the inquiry not lead to significant restrictions on the placement of communications facilities.

Police, fire, EMS, and other public safety agencies depend upon ubiquitous, reliable radio communications systems. That in turn requires that there be sufficient quantity, size, and location of transmission towers. As public safety systems continue to move into the 800 MHz and 700 MHz bands, towers will become even more important to provide adequate in-building coverage and service to isolated locations. In many areas, tower siting is the most critical, and most difficult, aspect of designing a public safety communications system.

Public safety also requires that there be fully functional "Enhanced 9-1-1" systems, providing accurate location information about reported emergencies. The FCC has adopted rules to require wireless carriers to provide Enhanced 9-1-1, the accuracy of which is often a function of the number and location of cell sites.

Therefore, we urge that the Commission take into consideration in this proceeding the vital role of communications towers in the protection of life, health and property.

Respectfully submitted,

A handwritten signature in black ink that reads "Vincent R. Stile". The signature is written in a cursive style with a large, sweeping initial "V".

Vincent R. Stile
President