

**ASSOCIATION OF PUBLIC-SAFETY COMMUNICATIONS OFFICIALS
INTERNATIONAL ASSOCIATION OF CHIEFS OF POLICE
INTERNATIONAL ASSOCIATION OF FIRE CHIEFS**

October 23, 2006

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Application for Consent to Transfer of Control filed by AT&T, Inc. and
BellSouth Corporation, WC Docket 06-74 and DA 06-2035

Dear Ms. Dortch:

The Association of Public-Safety Communications Officials-International (“APCO”), the International Association of Chiefs of Police (“IACP”), and the International Association of Fire Chiefs (“IAFC”) (collectively the “Public Safety Organizations”) hereby submit the following statement in response to the Commission’s *Public Notice* seeking comments regarding a letter from AT&T, Inc. (“AT&T”), submitted on October 13, 2006, in the above-referenced proceeding. The Public Safety Organizations represent the leadership of many of our nation’s first responder agencies and the professionals who manage and operate public safety communications systems.

AT&T’s letter proposes a series of conditions to Commission approval of the AT&T/BellSouth merger. Of particular interest to the Public Safety Organizations is the proposed condition that “in order to further promote public safety, within thirty days of the Merger Closing Date, AT&T/BLS will donate \$1 million to a section 501(c)(3) foundation or public entities for the purpose of promoting public safety.” We believe the proposed donation would be beneficial to our nation’s first responders and would clearly be in the public interest. However, we also suggest that an ongoing commitment of this scale would provide a more lasting and substantial benefit to public safety.

We also believe that an appropriate donee would be the Public Safety Foundation of America (“PSFA”), an existing 501(c)(3) entity established by APCO. The PSFA has distinguished record of supporting local community E9-1-1 deployment and other improvements to public safety communications. The Public Safety Organizations have agreed that, through an advisory committee to PSFA, they would collaborate to develop appropriate guidelines and procedures for the effective and efficient use and distribution of the donated funds to promote E9-1-1 deployment and improve public safety communications.

The Public Safety Organizations appreciate the interest of AT&T and the FCC in this critical matter.

Respectfully submitted,

Wanda McCarley, President
APCO International

Chief Joseph C. Carter, President
International Association of Chiefs of Police

Garry Briese, Executive Director
International Association of Fire Chiefs