



¶3 - *Frequency Coordination and Related Matters.*

The Commission seeks comments on whether frequency coordination should continue to be required for applications to modify a license to reduce the authorized bandwidth. APCO believes coordination is necessary for such applications, especially applications shifting channel centers or from analog to digital operation or otherwise changing emission designator.

Even where application to reduce bandwidth does not involve shifting channel centers or digital conversion, coordination is still necessary to prevent critical license modification without coordinators' knowledge. Applications to modify a license are typically used to "clean up" the license by providing updated ERP, tower height and location information, etc. Such information is critical to the frequency coordination process and could easily slip through the cracks if the application does not go through a frequency coordinator. The cost of frequency coordination for such "minor" modifications is small (*e.g.*, APCO's published rates for application of that nature are \$50 per call with a \$100 minimum).

¶4 – *Paging on Public Safety VHF Frequencies.* The Commission notes the existence of paging on some VHF public safety frequencies and expresses concern regarding potential interference to voice communication. This is a matter that is best left to FCC-certified frequency coordinators to address on a case-by-case basis, as they are best qualified to provide for public safety paging use in a manner that will not cause interference to public safety voice channels. There is no need for further FCC regulation. Restrictions would be overly broad, potentially blocking critical paging operations.

¶7 – *Cross-Banding.* APCO supports the proposed clarification of the Commission's rules.

¶ 8 – *Mobile Repeaters*. This matter concerns only the Industrial/Business Pool.

¶ 9 – *Expired Licenses*. APCO supports the LMCC position set forth in the NPRM.

¶ 10 – *Multiple Licensing*. This matter is primarily of concern to the Industrial/Business Pool.

¶ 12 – *Transit Systems and Toll Roads*. The Commission seeks comment as to whether privately- owned, non-profit metropolitan transit systems and toll roads should be eligible for Public Safety Pool channels. APCO strongly opposes such eligibility as it would open the door for other non-critical services to obtain licenses for scarce public safety spectrum. Rather than change the eligibility rules, the FCC should continue to allow eligible licensees (state and local governments) to authorize use of their Public Safety Pool channels for such transit and toll road operations. Absent such voluntary authorization from an eligible licensee, Public Safety Pool channels should only be used by state/local government entities.<sup>1</sup>

¶ 14 – *Industrial/Business Pool Eligibility*. APCO supports the Commission’s conclusion that government operation of commercial activities, such as golf courses and electric utilities, should be eligible for Industrial/Business Pool channels. This will prevent such operations from consuming scarce public safety channels. APCO also supports the NPSTC request regarding use of Industrial/Business Pool itinerant frequencies for surveying equipment operated by government entities.

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<sup>1</sup> Pursuant to Section 90.20, non-government generally requires authorization from a relevant state/local government body.

¶14- *Disturbance of AM Broadcast Station Antenna Patterns*. APCO supports LMCC's comments on this issue.

¶16- *FB8T Station Class*- APCO takes not position on this issue.

¶17 - *Reorganization of Part 90*. The Commission asks whether there should be a separate C.F.R. rule part for public safety. APCO does not support such a division within the rules.

While we supported, and continue to support the creation of a new Public Safety & Homeland Security Bureau with direct licensing and policy responsibility for public safety licensees, separate rule parts for Industrial/Business (IB) and Public Safety Pool channels would create confusion and eventually contradictory rules and rule interpretations.

This is of particular concern as there are several frequency bands (including portions of 470-512 MHz and 800 MHz) where specific frequencies are "shared" among public safety and IB, and there is interleaving of pool channels through the VHF, UHF, and 800 MHz frequency bands. Currently, the rules distinguish between public safety and other licensees subject to Part 90, and that distinction is sufficient. A separate rule part is unnecessary at this time.

## CONCLUSION

Therefore, APCO recommends that the Commission proceed in a manner consistent with the comments set forth above.

Respectfully submitted,

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COMMUNICATIONS OFFICIALS-  
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