

The Commission proposes use of Part 101 frequency coordination procedures for 4.9 GHz fixed links. However, as explained in the comments being submitted today by NPSTC, the nature of 4.9 GHz systems and operations are significantly more varied than the fixed point-to-point microwave links generally subject to Part 101 of the Commission's rules. APCO supports NPSTC's alternative recommendation that there be a registration procedure administered by the National Regional Planning Committee (NRPC) in conjunction with individual public safety regional planning committees (RPCs). This will be a more efficient and effective means of coordination and will better accommodate the variety of 4.9 GHz applications. It will also ensure regional participation in the assignment and use of valuable public safety spectrum resources, consistent with local needs and requirements.

Respectfully submitted,

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