

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
)	
Region 24 700 MHz Regional Planning Committee Petition for Rulemaking)	RM 11551
)	
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band)	PS Docket No. 06-229
)	

COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”) hereby submits the following brief comments in response to the Commission’s *Public Notice*, Report No. 2893 (July 31, 2009), seeking comments on the above-captioned petition filed by the Region 24 700 MHz Regional Planning Committee (“Region 24”).

Founded 75 years ago, APCO is the nation’s oldest and largest public safety communications organization. Most of APCO’s members are state or local government employees who manage and operate communications systems for police, fire, emergency medical, forestry conservation, highway maintenance, disaster relief, and other public safety agencies. APCO is the largest FCC-certified frequency coordinator for Part 90 Public Safety Pool channels, and appears regularly before the Commission on a wide variety of public safety communications issues.

Region 24’s petition notes that certain of the Commission’s rules regarding buildout dates for state-wide licenses and implementation deadlines for 6.25 kHz narrowband bandwidth operations were premised on five-year and ten-year cycles from the then-presumed start date of 700 MHz operations, January 1, 2007. However, due to subsequent legislative actions, the 700

MHz spectrum was not available for public safety deployment in much of the nation until June 12, 2009, the ultimate digital television transition date. Therefore, Region 24 recommends that the relevant 700 MHz rules be modified to reflect time periods starting at June 12, 2009.

APCO supports this modification as it reflects the reality of 700 MHz narrowband channel deployment.

Therefore, APCO recommends that the Commission proceed towards modification of its rules, consistent with the Region 24 petition for rulemaking.

Respectfully submitted,

/s/

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