



APCO International

Association of Public-Safety Communications Officials-International, Inc.

HEADQUARTERS

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October 1, 2009

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

Re: PS Docket 06-229, PS Docket 07-114, WT Docket 02-55, Notice of *Ex Parte* Meeting

Dear Ms. Dortch:

This is to inform the Commission that APCO President Richard Mirgon, Immediate Past President Chris Fischer, Executive Director George Rice, and the undersigned met with the following commissioners and staff on September 30, 2009, to discuss the above-referenced proceedings:

Chairman Julius Genachowski, along with David Furth (PSHSB) and John Leibovitz (WTB)
Commissioner Meredith Attwell Baker, along with Erin McGrath
Commissioner Mignon Clyburn, along with Rene Crittendon
Admiral Jamie Barnett, David Furth and Jeff Cohen (PSHSB)

As to PS Docket 06-229, we reiterated positions set forth in prior written comments, including APCO's strong support for a nationwide public safety broadband network that would provide interoperable, reliable and ubiquitous communications for first responders in urban, suburban, and rural settings. We noted our support for legislation to reallocate the D Block to public safety, but also explained that, absent adoption of such legislation, the Commission should proceed to auction the D block with conditions that would facilitate public-private partnerships to fund the network and provide cost-effective and spectrum-efficient broadband communications in a shared network environment. Consistent with our recent comments in the proceeding, we also noted support for allowing early deployments by local, state, and regional government entities, subject to requirements to ensure interoperability and the overriding goal of a national network. We also noted our support for LTE as a broadband technology standard to promote interoperability and to allow public safety to gain the economic benefits of using a widely-accepted 700 MHz broadband standard. While we support use of a commercial technology and public-private partnerships to deploy the network, we also emphasized that the network must be built and maintained to meet public safety requirements to the maximum extent feasible, and that first responders cannot rely upon purely commercial networks for mission-critical broadband communications. We also commented that it will be important to facilitate participation in the network by critical infrastructure industries and federal partners. Finally, we informed the Commission that APCO would be hosting another meeting of the key public safety stakeholders in this proceeding in early November.

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As to PS Docket 07-114, we urged the Commission to move forward to modify its rules regarding compliance and measurement of E9-1-1 accuracy, and concurred that it would be beneficial for the Commission to refresh the record to obtain a current assessment of the state-of-art of wireless accuracy capabilities.

As to WT Docket 02-55, APCO indicated that all parties need to move forward as quickly as possible to complete rebanding of the 800 MHz band.

Please contact the undersigned should the Commission require any additional information.

Respectfully submitted,

/s/

Robert M. Gurss
Director of Legal and Government Affairs

cc: John Leibovitz
David Furth
Erin McGrath
Rene Crittendon
Jeff Cohen