

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

In the Matter of)	
)	
Petition by Enterprise Wireless Alliance)	RM-11572
Requesting the Creation of New, Full Power,)	
Interstitial 12.5 kHz Channels in the 800 MHz Band)	

COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”) hereby submits the following brief comments regarding the above-captioned Petition for Rulemaking filed by the Enterprise Wireless Alliance (“EWA”).

APCO is the nation’s oldest and largest public safety communications organization. Founded in 1935, APCO has nearly 16,000 members, most of whom are state or local government employees who design, manage, and operate public safety communications systems for police, fire, emergency medical, forestry conservation, highway maintenance, disaster relief, and other public safety agencies. APCO is the largest FCC-certified coordinator for Part 90, Public Safety Pool radio frequencies, and regularly appears before the Commission on a wide range of issues regarding public safety communications.

EWA has asked the Commission to initiate a proceeding to adopt rules that would allow the assignment of 12.5 kHz “interstitial” channels in the 800 MHz band. APCO joins with its colleagues in the Land Mobile Communications Council (“LMCC”)¹ in supporting the EWA petition with the important caveat that there must be further study and consideration of interference criteria and frequency coordination procedures. For example, the Commission

¹ LMCC’s membership includes all of the certified Part 90 frequency coordinators.

should seek comments regarding EWA's proposed contour values,² how those values were derived, and what testing has been performed to ensure protection of incumbent systems.

Allowing interstitial channel assignments, if properly managed, could provide additional channel capacity and improve spectrum efficiency in the 800 MHz bands. As emphasized by EWA and LMCC, this change would not have any impact on the continued rebanding of 800 MHz systems, and would not require any modification to existing licenses or equipment.

Therefore, for the reasons stated above, the Commission should initiate a rulemaking proceeding as proposed in the EWA petition.

Respectfully submitted,

/s/

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² EWA's petition mentions two contour values: (i) 34 dBu interference contour of proposed facility versus 40 dBu service contours of incumbent(s), and (ii) 26 dBu interference contour of proposed versus 40 dBu service contour of incumbent(s). The latter applies in case of digital or data system.