

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

In the Matter of)
)
Implementing a Nationwide,)
Broadband, Interoperable Public) PS Docket No. 06-229
Safety Network in the 700 MHz)
Band)

**REPLY COMMENTS OF APCO
ON
NPSTC BROADBAND TASK FORCE AND PUBLIC SAFETY SPECTRUM TRUST
TECHNICAL RECOMMENDATIONS FOR 700 MHz BROADBAND DEPLOYMENTS**

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”) hereby submits the following reply to comments submitted in response to the Commission’s *Public Notice*, DA 10-458 (released March 17, 2010), in the above-captioned proceeding.

Founded over 75 years ago, APCO is the nation’s oldest and largest public safety communications organization. Most of APCO’s over 15,000 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 appears regularly before the Commission on a wide variety of public safety communications issues, and has been at the forefront of the FCC’s proceedings regarding the 700 MHz band and the development of a national public safety interoperable broadband network.

APCO joins with most of the initial commenters in generally supporting the recommendations in the NPSTC Broadband Task Force Report as submitted to the Commission by the Public Safety Spectrum Trust (“PSST”). There must be uniform interoperability standards for *all* public safety users of the 700 MHz band, whether they are operating on local public safety broadband networks, a national public safety broadband network, or (as the FCC suggests in the National Broadband Plan) roaming on commercial networks.

LTE is the unanimous choice of public safety users and all current 700 MHz commercial licensees for a standard broadband technology, and the BBTF did a good job of identifying additional requirements to ensure comprehensive interoperability. Those standards should be adopted, though only those that are absolutely necessary for interoperability should become mandatory. As we indicated previously:

APCO generally supports the recommendations in the 700 MHz Broadband Task Force Report regarding interoperability. The Report identifies applications that should be required elements, including Internet access and VPN capability, as that will allow roaming users to connect through the Internet to their home systems and applications. APCO cautions against being overly specific regarding other application requirements. Such application standards, while perhaps desirable, need not be accomplished at this early stage of the network deployment. For the most part, Internet access, VPN capability, and other secure tools will be sufficient to ensure that network users will always be able to access their home system applications.¹

There must also be recognition that LTE is not a fully-developed standard, and additional work is necessary for it to be sufficiently mature to meet the full panoply of public safety requirements. Thus, early deployments must be subject to additional interoperability requirements once appropriate standards become more developed.

¹ Comments of APCO on Petitions for Waiver to Deploy 700MHz Broadband Networks, PS Docket 06-229 (filed Sept 22, 2009).

The Commission needs to move forward as soon as possible to finalize the process for interoperability requirements to be adopted, enforced, and updated for all 700 MHz broadband public safety users. The relevant rights and responsibilities of state and local entities, who have demonstrated the need, desire, and capability to deploy 700 MHz broadband systems, must also be established as quickly as possible.² The relationship between those entities, the Public Safety Spectrum Trust, and the FCC must also be established, as that remains unclear in the Commission's National Broadband Plan and its public descriptions of the proposed Emergency Response Interoperability Center.

Respectfully submitted

ASSOCIATION OF PUBLIC-SAFETY
COMMUNICATIONS OFFICIALS-
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² See APCO Comments (Sept. 22, 2009) and Reply Comments (Nov. 16, 2009) regarding Petitions for Waiver.