

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Promoting More Efficient Use of Spectrum) ET Docket No. 10-237
Through Dynamic Spectrum Use Technologies)

COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”) hereby submits the following comments in response to the Commission’s *Notice of Inquiry*, FCC 10-198, released November 30, 2010 (“*NOI*”), in the above-captioned proceeding regarding dynamic spectrum use technologies.

Founded in 1935, APCO is the nation’s oldest and largest public safety communications organization. Most APCO 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.¹

APCO appreciates and supports the Commission’s goal in the *NOI* of gathering detailed information regarding the status of various dynamic spectrum use technologies. These technologies could someday lead to significant improvement in spectrum efficiency and promote new types of communications services and capabilities. However, APCO urges the Commission to proceed very cautiously, as some of these technologies could create dangerous interference to

¹ APCO is a member of the Land Mobile Communications Council and the National Public Safety Telecommunications Council, both of which are expected to file additional comments in this proceeding.

essential public safety and other incumbent operations. As discussed in the *NOI*, dynamic spectrum technologies are still in early stages of development, with little or no deployed operations. Long before dynamic spectrum technologies are rolled out for public consumption, there must be extensive testing in both labs and in the field to ensure that existing radio systems will not be harmed, especially those systems that are used to protect the safety of life and property.

Land mobile radio frequencies, which provide for the bulk of mission-critical public safety communications, pose particular challenges for dynamic spectrum technologies. Factors to consider include narrow channel bandwidths, interleaved channel assignments across service pools, the huge number of diverse and distinct licensees, the wide variety of deployed equipment, the intermittent use of channels in many instances, trunking systems, and the sensitive nature of the communications being transmitted by public safety and critical infrastructure licensees.

The *NOI*, at paragraph 54, specifically seeks comments regarding the potential for dynamic spectrum technologies to promote interoperability across public safety frequency bands. While that potential may well exist, far too little information is available today to determine the real prospects for dynamic spectrum technologies to address this long-standing public safety communications problem. Furthermore, even assuming that the technical issues can be resolved, deployment of dynamic spectrum technologies would face the difficult problem of ensuring backward compatibility (and non-interference) with legacy systems in the same frequency band. That issue is compounded by the large number of distinct licensees in public safety bands, each with different funding cycles, equipment lifespans, and operational requirements. Therefore, as

with many public safety communications issues, funding will be a critical issue to resolve before dynamic spectrum technologies can be seriously considered for wide-scale public safety use.

CONCLUSION

Therefore, APCO supports the Commission's inquiry into dynamic spectrum technologies, but urges the Commission to exercise extreme caution for the reasons discussed above and in the comments of other parties.

Respectfully submitted,

/s/

Robert M. Gursr
Regulatory Counsel
APCO International
(202) 236-1743
gursr@apcomail.org

APCO Government Affairs Office
1426 Prince Street
Alexandria, VA 22314
(571) 312-4400