



# APCO International

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

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2010 - 2011

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March 3, 2011

Jamie Barnett, Real Admiral (Retired)  
Chief, Public Safety & Homeland Security Bureau  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

Dear Admiral Barnett:

The January 1, 2013, narrowbanding deadline is fast approaching for public safety licensees operating in radio frequency bands below 512 MHz. We share the Commission's goal of encouraging all relevant licensees to meet that deadline, which will lead to more efficient use of the radio spectrum and create additional public safety channels. However, as you are well aware, a significant number of licensees are unlikely to satisfy the rebanding deadline, due to a variety of factors. Therefore, we would like to recommend some procedures that may help identify non-compliant licensees and provide regional guidance to assist those licensees to narrowband their current systems in a timely manner, or otherwise satisfy the Commission's efficiency and interoperability goals as discussed below.

We also suggest below some potential criteria for the Commission to consider in evaluating requests for waivers of the rebanding deadline. In particular, we believe that the Commission should give favorable consideration to those seeking additional time to facilitate timely migration to more efficient operations, whether such operations are in the same band as the licensees' current systems, or in another frequency band as part of an interoperable radio network.

### *Regional Planning*

We recommend that the Commission request that the current regional planning committee chairs (for 700 and/or 800 MHz) convene new committees in each of the 55 regional planning committee regions for the purpose of facilitating compliance with the narrowbanding requirement. All public safety licensees operating in bands below 512 MHz should be invited to participate. The committees should be asked to (a) identify licensees who are not in compliance with the narrowbanding deadline, (b) obtain information from non-compliant licensees regarding the ability of their existing equipment to meet the narrowbanding

requirements, and (c) develop regional approaches that might provide non-compliant licensees an option to migrate to more efficient operations, whether on existing licenses or to other interoperable solutions that meet relevant efficiency requirements. While many of the impacted licensees may still require waivers, this regional process may assist them in formulating a plan forward.

### *Waiver Standards*

We also recommend that the Commission consider waivers of the narrowbanding deadline where the applicant is proposing one of the following:

- (1) a plan to convert existing wideband licenses to narrowband, provided that the plan includes a description of work necessary to reach compliance (*e.g.*, whether existing radios are narrowband-capable), the licensee's plan to obtain any funding necessary for the narrowbanding effort, a timeline for compliance, and documentation that the applicant has notified any other licensees that might be impacted by a delay in its narrowband implementation; *or*
- (2) a plan to move the licensee's operations from a wideband system to more efficient systems that may operate in a different frequency band, provided that: (a) the system to which the licensee is migrating will meet the relevant efficiency requirements for the band on which the system operates (*e.g.*, UHF, 700 MHz, 800 MHz); (b) the migration will promote interoperability; (c) the licensee's plan includes a description of the effort, sources of funding, and timeline; and (d) the licensee will relinquish its current frequencies (or will incorporate those frequencies into the new system with narrowband operation).

We would be pleased to discuss these proposals with you at your convenience. APCO stands committed to working with the Commission and public safety licensees to facilitate completion of narrowbanding in a rational, efficient manner that takes into consideration the specific needs and plans of each licensee.

Respectfully submitted,



William D. Carrow, President