

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

In the Matter of )  
 )  
Intentional Interruptions of Commercial Mobile ) GN Docket No. 12-52  
Radio Service by Government Authorities for the )  
Purpose of Ensuring Public Safety )

**COMMENTS OF APCO**

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”) hereby submits the following comments in response to the Commission’s above-captioned *Public Notice*, DA 12-311, released March 1, 2012.

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 appears regularly before the Commission on a wide range of public safety communications issues.

The Commission is seeking comments on issues concerning the intentional interruption of Commercial Mobile Radio Services (CMRS) by government officials. As noted in the *Public Notice*, there have been several instances involving such disruptions, and others that can be contemplated. Examples include preventing use of CMRS to organize civil disturbances that are perceived as threats to public safety, blocking criminal use of CMRS in hostage or other dangerous situations, or preventing terrorists from using CMRS to detonate explosive devices.

The *Public Notice* identifies the many complex legal, administrative, policy and technical issues surrounding potential government disruption (or government ordered disruption) of

CMRS communications. APCO's principal concern is that any such disruption that may be appropriate under relevant law and policy be as narrowly focused as possible to avoid disruption of (i) the public's ability to call 9-1-1 for emergency assistance; (ii) the ability of government officials themselves to utilize CMRS; or (iii) mission-critical public safety radio communications that may be operating on radio frequencies in spectrum adjacent to CMRS frequencies.<sup>1</sup>

A majority of calls to 9-1-1 are now made from CMRS devices. Thus, any disruption of CMRS, whether intentional or unintentional, has the potential to block 9-1-1 calls in the impacted area. The *Public Notice* seeks comments on the technical ability to confine intentional CMRS disruption in a manner that would still allow 9-1-1 calls to be completed. We look forward to those comments.

Government officials also increasingly rely upon CMRS for wide variety of important communications. Thus, before there is any disruption to CMRS services, there needs to be timely and effective coordination among all of the governmental bodies that have jurisdiction over the relevant geographic area. Similarly, there must be both technical and operational coordination to ensure that public safety radio communications are not disrupted. Some CMRS carriers operate today in the 800 MHz band, which is also used for police, fire, and emergency medical communications in many parts of the nation. In the future both CMRS and public safety agencies will also operate in adjacent portions of the 700 MHz band. Therefore, there is a danger that disruptions intended for only CMRS could also "bleed over" and lead to unintended interference to public safety radio communications in nearby or overlapping jurisdictions.

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<sup>1</sup> Similar issues can arise with intentional "jamming" of CMRS signals to prevent cell phone use by inmates in correctional facilities.

Therefore, APCO urges that any local, state or federal policies governing intentional disruption of CMRS take into consideration the issues identified above regarding public safety communications.

Respectfully submitted,

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