

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of:)
)
Implementation of Sections 309(j) and 337) of the) WT Docket No. 99-87
Communications Act of 1934 as Amended;)
Promotion of Spectrum Efficient Technologies on)
Certain Part 90 Frequencies)

COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”) hereby submits the following brief comments in response to the Commission’s *Public Notice*, DA 12-1913 (November 30, 2012), seeking comments on a “Petition to Delay Indefinitely Implementation of Section 90.203(j)(5) of the Commission’s Rules” filed by Ritron, Inc. (Ritron) on September 21, 2012. Section 90.203(j)(5) provides for a deadline (since extended to January 1, 2013) after which the Commission will no longer accept applications for certification of Part 90 equipment in the 150-174 MHz and 450-512 MHz bands that cannot operate in a 6.25 kHz mode or with equivalent efficiency.

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 Public Safety Pool frequencies and appears regularly before the Commission on a wide range of public safety communications issues.

APCO supports the Ritron Petition as there would be no substantial public benefit to requiring new equipment certifications to be 6.25 kHz capable at this time. Our principal

concern is that there is no interoperability standard for 6.25 kHz technology. Unless and until that occurs, and 6.25 kHz equipment becomes widely available, the Commission should not impose a 6.25 kHz equipment certification requirement.

Respectfully submitted,

/s/

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