



Leaders in Public Safety Communications™

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January 22, 2013

Ms. Marlene Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

RE: ET Docket Nos. 10-236 and 06-155 (Tentative Agenda Item for January 31, 2013 Open Meeting)

Dear Ms. Dortch:

On March 9, 2011, APCO filed comments in the above-referenced proceedings regarding proposed changes to the Commission's experimental licensing rules. Our comments supported proposals that would retain important protections against potential interference to radio communications on Public Safety frequency bands.

The purpose of this letter is to note our additional concern with possible rule changes that would allow experimentation on frequency bands used for commercial mobile radio services (CMRS) without prior coordination with the CMRS licensee. Public safety agencies are increasingly using commercial services to enhance their communications capabilities. Thus, interference to a CMRS system from an experimental operation could interfere with critical public safety communications. In addition, there is the potential for wireless calls to 9-1-1 to be disrupted.

Therefore, APCO urges the Commission to adopt appropriate safeguards to prevent interference from experimental systems to both Public Safety and CMRS operations.

Please contact the undersigned should the Commission have any questions.

Respectfully submitted,

*/s/*

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