

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

In the Matter of	)	
	)	
Amendment of Part 90 of the Commission's Rules	)	WP Docket No. 07-100
	)	
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band	)	PS Docket No. 06-229
	)	
Service Rules for the 698-746, 747-762 and 777-792 MHz Bands	)	WT Docket No. 06-150

**COMMENTS OF APCO REGARDING NPTSC 4.9 GHz REPORT**

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”) hereby submits the following brief comment in response to the Commission’s *Public Notice*, DA 13-2096 (October 30, 2013), seeking comments regarding the 4.9 GHz National Plan Recommendations Final Report submitted by the National Public Safety Telecommunications Council (“NPSTC”) on October 24, 2013 (“NPSTC Report”).

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 range of public safety communications issues. APCO is a member of the NPSTC Governing Board and participated in the development of the NPSTC Report.

APCO's prior comments in this proceeding explained that the "most significant problem facing the 4.9 GHz band is the lack of effective frequency coordination and planning" which "creates chaotic, haphazard equipment deployment that is incompatible with the needs of interference-free, mission-critical radio communications."<sup>1</sup> We also recommended that a new database be established with updated and more detailed information on all licensed operations. APCO supports the NPSTC Plan as it address these and related issues. The end result will be more effective and efficient public safety use of the 4.9 GHz band.

### CONCLUSION

Therefore, APCO urges the Commission to proceed with rules implementing the NPSTC Plan.

Respectfully submitted,

/s/

Robert M. Gursr  
Senior Regulatory Counsel  
APCO International  
(202) 236-1743 (mobile)  
[gursr@apcomail.org](mailto:gursr@apcomail.org)

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

November 22, 2013

---

<sup>1</sup> Comments of APCO (Oct. 28, 2012).