

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

In the Matter of)	
)	
Emission Mask Requirements for Digital)	PS Docket No. 13-209
Technologies on 800 MHz NPSPAC Channels;)	RM-11663
Analog FM Capability on Mutual Aid and)	
Interoperability Channels)	

REPLY COMMENTS OF APCO

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”) hereby submits the following reply comments to clarify its initial comments regarding Analog FM capability submitted in response to the Commission’s *Notice of Proposed Rulemaking*, FCC 13-117, released August 27, 2013, in the above-captioned proceeding.

APCO’s continues to support establishing analog FM as the FCC-mandated common modulation for interoperability and mutual aid frequencies in the 150-174, 450-470, and 800 MHz bands. APCO suggested in its initial comments that “all equipment certified for use by public safety entities in those bands be required to include analog FM emissions (11K0F3E or 16K0F3E, depending on band) capabilities” and proposed specific rule modifications in that regard.¹ However, upon further review, APCO believes that it is unnecessary, and potentially harmful, to require fixed base station equipment to meet such a certification requirement. Interoperability can be achieved with equipment certification requiring analog FM for mobiles and portables alone. Requiring that all fixed base station equipment also include analog FM capability could add unnecessary equipment costs for licensees, without any substantial benefit.

¹ Comments of APCO (Nov. 14, 2013).

Therefore, APCO now recommends the following revision to Section §90.203(j)(1), in lieu of the language proposed in its initial comments:

- . (1) Applications for certification received on or after January 1, 2005, for mobile and portable transmitters designed to transmit voice on public safety frequencies in the 150-174 MHz band will be granted only if the mobile/portable equipment is capable of operating *in the analog FM mode* on the nationwide public safety *channels* in the 150-174 MHz band. (See §90.20(c), (d) of this part.) Applications for certification received on or after January 1, 2005, for mobile and portable transmitters designed to transmit voice on public safety frequencies in the 450-470 MHz band will be granted only if the mobile/portable equipment is capable of operating *in the analog FM mode* on the nationwide public safety interoperability *channels* in the 450-470 MHz band. (See §90.20(c), (d) of this part.)

Similarly, proposed Section 90.203(i) should be limited to mobile and portable equipment. In addition, APCO recommends that Section 90.20(d)(80) be amended to require the use of analog (11K2F3E) emissions for operations on the VHF and UHF interoperability channels, and that Sections 90.617(a)(1) and 90.619(a)(5)(i) be amended to require the use of analog (11K2F3E) emissions for operations on the mutual aid channels.

CONCLUSION

As set forth above and in its initial comments, APCO supports the Commission's proposed requirements for Mask H compliance in the NPSPAC band, and adoption of Analog FM as the standard for 800 MHz, VHF, and UHF public safety mutual aid and interoperability channels.

Respectfully submitted,

/s/

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