

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

In the Matter of )  
 )  
Amendment of Section 90.20(d)(34 and 90.265 of ) PS Docket No. 13-229  
the Commission’s Rules to Facilitate the Use of )  
Vehicular Repeater Units )

**COMMENTS OF APCO**

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”), hereby submits the following comments in response to the Commission’s *Notice of Proposed Rulemaking*, FCC 13-121, released September 16, 2013 (“*NPRM*”), in the above-captioned proceeding<sup>1</sup> regarding vehicular repeater systems (“VRS”) used by public safety licensees to expand radio coverage for portable radios in emergency situations.

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.

The Commission seeks comment as to whether six 173 MHz remote control and telemetry channels should be made available for public safety VRS. As APCO and others have already indicated in the record of this proceeding, there is a substantial need for additional VRS channels. While there are current telemetry users of the 173 MHz channels in some areas, APCO believes that the channels can and should be shared through appropriate frequency

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<sup>1</sup> The *NPRM* begins at paragraph 41 of the Commission’s “*Order and Notice of Proposed Rulemaking*.”

coordination. The power levels for VRS on the telemetry channels should be 5 watts ERP as suggested in the *NPRM*.

The Commission should also take steps to allocate additional spectrum in VHF and other bands for public safety VRS. A variety of VRS channel options need to be available to accommodate different operating scenarios, separation requirements, equipment availability, and efficient frequency planning. In VHF, the frequencies now allocated for Rural Radiotelephone Service in Section 22.725 of the Commission's rules appear to be underutilized in many areas, and may be usable for VRS operations.<sup>2</sup>

In the UHF (450-470 MHz) spectrum, it appears that that certain medical telemetry channels could in some areas be made available by waiver or rulemaking for VRS. Many emergency medical service operations (*e.g.*, ambulance to hospital communications) have migrated to consolidated 700 or 800 MHz trunked systems, sometimes with medical telemetry data using commercial broadband networks. As a result, there appears to be reduced use of the four 458 MHz frequencies designated in Section 90.20(c)(58), along with the eight 463/468 MHz frequency pairs designated in Section 90.20(d)(66)(i) as MED-12, MED-22, MED-32, MED-42, MED-52, MED-62, MED-72 and MED-82. Shared use of these channels for VRS in at least some areas should be further explored.

APCO also suggests that a portion of the 700 MHz Guard Band spectrum be considered for VRS use. APCO has advocated that Congress vested FirstNet with broad powers and responsibilities to manage the implementation of the nationwide public safety broadband network, which extend to the guard bands located at 768-769/798-799 MHz.<sup>3</sup> With this

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<sup>2</sup> See National Public Safety Telecommunications Council, Public Safety Communications Assessment, 2012-2022: Technology, Operations, & Spectrum Roadmap, June 5, 2012, Section 4.5.2, at 99.

<sup>3</sup> See Comments of APCO, PS Docket No. 12-94, 06-229, at 3-4 (filed May 24, 2013)

backdrop, the paired frequencies at 768.750-769.0/798.750-799.0 MHz could be considered for VRS to support public safety operations in the 700 and 800 MHz bands. This spectrum falls in the upper 250 kHz of the 1 MHz Guard Band and thus is spectrally closer to the narrowband operations than to the broadband allocation. It appears that VRS could operate in that spectrum without receiving harmful interference from (or causing interference to) broadband operations in the main portion of the band. Use of these frequencies for VRS should be subject to regional planning, utilizing the existing 700 MHz Regional Planning Committees, and prior coordination with FirstNet.

### CONCLUSION

For the reasons set forth above, APCO urges the Commission to proceed to allow public safety VRS use of telemetry channels identified in the *NPRM*, and to take steps to allow additional VHF, UHF, and 700 MHz channels to also be used for VRS.

Respectfully submitted,

/s/

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