

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

In the Matter of )  
 )  
Conditional Licensing Authority Above ) RM-11722  
470 MHz )

**COMMENTS OF APCO**

The Association of Public-Safety Communications Officials-International, Inc. (“APCO”) hereby submits the following brief response to the Commission’s *Public Notice*, DA 14-867, June 23, 2014, seeking comments in the above-captioned proceeding regarding a Petition for Rulemaking submitted by the Land Mobile Communications Council (“LMCC”) on May 15, 2014 (“LMCC Petition”).

Founded in 1935, APCO is the nation’s oldest and largest public safety communications organization. APCO has over 20,000 members, most of whom 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 LMCC, of which APCO is a member, has asked the Commission to initiate a notice of proposed rulemaking to allow conditional licensing procedures to apply in private land mobile radio frequency bands above 470 MHz. The *Public Notice* asks specifically whether the proposal should extend to the Public Safety Pool. APCO supports the LMCC Petition and agrees that Public Safety Pool channels above 470 MHz should be subject to conditional licensing

authority. As discussed in the LMCC Petition, this will expedite the application process and allow for more rapid deployment of critical radio communications facilities.

Therefore, for the reasons discussed above and in the LMCC Petition, the Commission should initiate a rulemaking proceeding to modify its rules regarding conditional licensing authority.

Respectfully submitted,

/s/

Robert M. Gurss  
Senior Regulatory Counsel  
APCO International  
(202) 236-1742 (m)  
[gurssr@apcomail.org](mailto:gurssr@apcomail.org)

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

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