

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

In the Matter of)	
)	
Qualcomm’s Petition for Rulemaking to)	RM-12020
Allocate Spectrum and Establish Service Rules)	
for a New Communications Service in Portions)	WT Docket No. 19-116
of the 1675-1695 and 5350-5470 MHz Bands)	

**COMMENTS OF THE ASSOCIATION OF PUBLIC-SAFETY COMMUNICATIONS
OFFICIALS INTERNATIONAL, THE INTERNATIONAL ASSOCIATION OF CHIEFS OF
POLICE, THE INTERNATIONAL ASSOCIATION OF FIRE CHIEFS, AND THE NATIONAL
SHERIFFS’ ASSOCIATION**

On behalf of the membership of the Association of Public-Safety Communications Officials International (APCO), the International Association of Chiefs of Police (IACP), the International Association of Fire Chiefs (IAFC), and the National Sheriffs’ Association (NSA), we thank the Federal Communications Commission for the opportunity to express support for Qualcomm Incorporated’s (Qualcomm) petition for rulemaking in connection with their 5G device-to-device “sidelink” communications tool.¹ The public safety community welcomes the development of new 5G services and technologies that leverage global 3GPP standards to meet mission critical needs, allowing for the introduction of high-performing, cutting-edge, and cost-effective applications and services that empower public safety agencies and protect our communities, independent of network infrastructure. Sidelink will support continuity of operations, real-time situational awareness, and coordinated response efforts when traditional networks are unavailable, strengthening public safety’s ability to operate during the most critical moments.

¹ *Office of Engineering and Technology and Wireless Telecommunications Bureau Seek Comment on Qualcomm’s Petition for Rulemaking to Allocate Spectrum and Establish Service Rules for a New Communications Service in Portions of the 1675-1695 MHz and 5350-5470 MHz Bands*, RM-12020, WT Docket No. 19-116, Public Notice, DA 26-337 (April 7, 2026) (*Public Notice*); see also Qualcomm Petition for Rulemaking, WT Docket No. 19-116 (filed Feb. 20, 2026) (*Qualcomm Petition*).

Ensuring that public safety communications can continue uninterrupted, even when traditional networks are unavailable, is a public safety imperative. Sidelink enables direct user-to-user communications, capable of operating absent any fixed infrastructure. This device-to-device capability can promote public safety in areas where traditional network coverage is unavailable, offering the public safety community enhanced connectivity options and alternatives, maintaining connectivity to meet their critical needs. The ability to reach emergency services reliably and effectively is particularly acute during large-scale natural disasters, where entire communities may need emergency relief. The need for reliable and continuous coverage is also essential during more routine circumstances where traditional terrestrial coverage might be unavailable, such as inside buildings or dense urban canyons, or in remote or rural areas. In addition, sidelink will promote situational awareness and effective emergency response by identifying the caller's relative location through the use of reference devices within the topology of the mesh network.²

Sidelink is also directly responsive to public safety requirements and specifications. For example, sidelink addresses public safety's need for interoperable, standards-based communications that allow first responders to have reliable and mission-critical connectivity across agencies and jurisdictions. APCO, IACP, IAFC and NSA have been engaged with Qualcomm, in terms of sharing information regarding public safety needs and requirements, and intend to continue working collaboratively with Qualcomm and other stakeholders to ensure 5G sidelink is developed and implemented in a manner consistent with meeting public safety's mission-critical requirements.

We support Qualcomm's interest in identifying a spectrum home to support sidelink use. A consistent spectrum allocation affords agencies and network providers with increased opportunities to better support off-network, sidelink capabilities, when necessary. We also believe the "license-by-rule"

² Sidelink has the potential to transform public safety operations in high-risk scenarios. For example, sidelink could be a critical communications lifeline for first responders responding to in-building fires, making the difference between being cut off and isolated, and being able to communicate with peers inside the building as well as other connected devices. Sidelink could also ensure first responders have communications coverage in parking garages, subway tunnels, and other underground environments.

framework, as outlined in Qualcomm’s Petition, presents a reasonable approach to explore, among others. We recognize that Qualcomm’s Petition raises important spectrum and policy questions that would benefit from a larger discussion by all stakeholders. By initiating a rulemaking proceeding, the Commission can provide a forum to fully address implementation and other questions. For this reason, and in light of sidelink’s manifest public safety benefits, we respectfully ask the Commission to expeditiously grant Qualcomm’s Petition.

Respectfully submitted,

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