

APCO REPORTS

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ASSOCIATED PUBLIC-SAFETY COMMUNICATIONS OFFICERS INCORPORATED

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As calendar year 1984 comes to a close, there's a reflective mood at the APCO National Office. The association has in progress probably more projects than at any time in our history, and that is how it should be. Our principal regret is that some of the dedicated members whose efforts have brought us to this point are no longer with us to share in the launching of the undertakings we will give birth to in 1985.

This December, 1984 issue of the APCO Reports is being mailed to more than 700 paid subscribers, and is being mailed from our new National Office. The mailing labels were generated on the computer installed in the National Office some six months ago. The January issue of the APCO BULLETIN will be distributed to an all-time high of more than 6000 members and subscribers.

The largest (and we expect, most successful) Annual National Conference in APCO's history stands only eight months away. The long-awaited APCO Technician Testing Program will have its debut at that Conference in San Diego. So will the equally long-awaited APCO Telecommunicator Training Course.

APCO has a national Public Safety Radio Frequency Data Base, and, through the cooperation of our Chapters, is working on its improvement. We have begun the program of charging fees to support the development of computer hardware and software for the automated handling of radio spectrum in the public safety communications field, and are working with other organizations to make this endeavor the most successful frequency coordination undertaking in the land mobile communications community.

On the regulatory scene, we have never been more active. The National Board of Officers Meeting during the Gulf Coast Regional Conference in late January in Daytona Beach, Florida, will be tackling the most ambitious one-year program APCO has ever faced. A hand-picked Task Force representative of all regions of the country will be piecing together at that Conference the Frequency Coordination Program we'll be taking to the Federal Communications Commission in March. The Daytona Beach Conference will also be the setting for finalization of our plans to obtain the radio spectrum availability called for in recent changes in the Communications Act which mandate that the FCC develop a long-range, comprehensive plan to assure public safety services adequate spectrum for the performance of their missions, and to which the Commission has responded in its "notice of inquiry" in PR Docket 84-232 (Inquiry on Future Public Safety Telecommunications Requirements).

We have much to be thankful for. Our association's financial health is improving; our membership is growing; and we are being productive in the areas set out in the APCO "Purpose". All of us at the National Office thank you all, and trust that 1985 will be a great year for you.

NATIONAL OFFICE MOVE: We moved to our new and larger offices on Friday, December 21, 1984, in anticipation of the additional office space and additional personnel which are required to implement the programs which were adopted at the 50th Annual National Conference of APCO in August in Cincinnati.

Our principal mailing address remains the same: Post Office Box 669, New Smyrna Beach, Florida 32070. (Please don't use the 105½ Canal Street address in the future.) Our principal telephone numbers remain the same: 904/427-3461; 904/427-3462; and 904/428-8700. The American Telephone & Telegraph Co. was unable to install our new 800 telephone lines in time for our move. We are now assured that they will be in operation on January 7, 1985, and will give you that new number in the next issue of APCO Reports.

NEW APCO DEPUTY DIRECTOR: Walter Spencer, formerly President of Action Radio Information Systems, has been hired as Deputy Executive Director of APCO, effective December 1, 1984, and has been busily putting the association's Frequency Data Research Program in full stride this month, as one of his initial assignments.

Walter has for the past 15 years been reformatting and disseminating the FCC's frequency data base information to the public, including many of the APCO Chapters. He had previously served for six years as President of a Computer Service Bureau in the Washington, D.C., area; for five years as Vice President of CEIR's Western Region, in charge of Los Angeles and San Francisco Service Bureaus; and for four years as a Systems Engineer for IBM Federal Systems. Walter holds a BS in Business Management (Marketing) from UCLA (1958).

At APCO, Walter has overseen the establishment of APCO's own public safety data base of 264,000 records, and has distributed the information in the data file to APCO's Frequency Advisers in each state. Under the program, the Coordinators are to send additions, deletions and/or corrections to the National Office for updating of the existing file, which is based on the FCC's records.

Data from newly issued licenses will be entered into the APCO data base, along with the information received from the coordinators, and the Coordinators will be receiving quarterly, updated reports from the National Office. In its present form, the APCO automated data base can be used for quick frequency searches, printouts in various sequences, and some other purposes.

The National Office has issued a list of reminders for Coordinators and others interested in the new Frequency Data Research procedures:

- (a) The National Office is not to receive our new FDR-1 Form for license renewals. License renewal applications, when no amendments are involved, do not require coordination, and should be mailed directly to the FCC.
- (b) The National Office is to receive only the FDR-1 Form for services in which APCO is the FCC-recognized Coordinator: the Police Radio Service; the Local Government Radio Service (in cases where the applicant has selected APCO to serve as Coordinator); and the Fire Radio Service (in the geographical areas where APCO is the FCC-recognized Coordinator.)
- (c) The National Office is not to receive the FDR-1 Forms from the APCO Coordinator in cases where a Frequency Recommendation is not issued.
- (d) Purchase Order Numbers are to be included where they exist. In cases where there are no Purchase Order Numbers, the National Office will have to bill for the FDR service without them.
- (e) Frequency Advisory requests involving 800 megahertz frequencies should go directly

from the APCO Coordinator to the National Association of Business & Educational Radio, under the agreement APCO has with NABER for the initial handling of the 800 mhz requests. A copy of the request should be sent to the APCO National Office.

- (f) Under APCO's policies, all FDR requests will be returned by APCO, after action, to the applicants, not to equipment vendors or licensing agents.

COMPUTER-AIDED DISPATCH: The Computer-Aided Dispatch Consortium, made up of personnel from the Cities of St. Louis, Missouri, Minneapolis, Minnesota, and Greensboro, North Carolina, will be meeting in St. Louis January 23-25 to discuss ways to promote the effective use of CAD systems in the United States. Officials from governmental entities with or without CAD systems are being invited to attend the symposium. Contacts are Julius Turner, Director of St. Louis County Police Management Systems Bureau (314/889-2826), and Pat Huber, of Minneapolis (612/348-7210). The CAD Consortium was formed in 1982 in an attempt to share alternative ways to deal with issues facing CAD, including coping with an inflationary economy and higher demands for police, fire and emergency services.

BOARD OF OFFICERS MEETING: The APCO National Board of Officers will be holding its first full-fledged business meeting since the 50th Annual National Conference in August, on January 20-21, 1985, prior to the 1985 Gulf Coast Regional Conference January 23-25 in Daytona Beach, Florida. All operations of the National Office will be reviewed in detail at that time, preparatory to considering a budget for the association for the upcoming fiscal year, which will begin April 1, 1985.

In addition to budgetary matters, the Board will be reviewing regulatory initiatives of both the FCC and APCO; APCO's Technician Testing and Telecommunicator Training Programs; results of the 1984 Cincinnati Annual Conference and planning for the 1985 San Diego Annual Conference; Standing Committee activities, and progress being made by APCO's Program Managers; and recommendations from Immediate Past President Craig Jorgensen for changes in the structure of APCO.

TASK FORCE MEETING: Immediately following the Board of Officers Meeting, an APCO Task Force will begin the work of putting together the association's comments in the FCC's PR Docket No. 83-737, a "notice of proposed rule making" entitled "Frequency Coordination in the Private Land Mobile Radio Services". The 16-member Task Force will have its work cut out for it in sessions on January 21 and 22, as it melds into a unified position the diverse views of APCO's 41 Chapters in this complex and controversial proceeding.

APCO/FCCA MEETING: The marathon week in Daytona Beach will also accommodate a joint meeting of the APCO Board of Officers and the Executive Committee of the Forestry, Conservation Communications Association, to review planning for the San Diego Conference, to be held August 26-29, 1985 at the Town & Country Hotel, which will be an historic "first", at which both APCO and FCCA will hold their Annual Meetings simultaneously under one roof, and share common exhibitors and many of the presentations at the Conference, yet conduct their respective business sessions separately.

PUBLIC SAFETY COMMUNICATIONS COUNCIL: APCO, with the early encouragement of others, had also recommended that a meeting of the Public Safety Communications Council be held during the Daytona Beach Conference, to coordinate as far as possible the views of the five PSCC member organizations with respect to the FCC's Frequency Coordination "notice of proposed rule making" in PR Docket 83-737, but fell short in its efforts as the PSCC meeting to accomplish that was scheduled instead for January 11, 1985 in Washington, D.C.

The other members of the Public Safety Communications Council are the Forestry, Conservation Communications Association; the International Municipal Signal Association; the Eastern States Public-Safety Radio League; and the American Association of State Highway & Transportation Officials. The PSCC had been established shortly after the FCC set up

the Local Government Radio Service in 1958, to work out joint frequency coordination procedures for those entities eligible for radio licensing by the Commission in that service.

One of the effects of the FCC's proposals in PR Docket 83-737, if adopted as issued initially by the Commission, could be the elimination of the need for the joint coordination procedures in the Local Government Service, since the FCC has proposed that it will select a single organization to perform frequency coordination in Local Government, along with single organizations to provide such service in the other public safety groups: police, fire, special emergency, forestry/conservation, and highway maintenance.

Since APCO has established its Task Force to prepare comments in 83-737, since the Task Force will not be meeting until January 21-22, and since the principal officers of FCCA will also be meeting in Daytona Beach that week, APCO had suggested that PSCC also defer its meeting until after positions had gelled, at least somewhat. It is expected that even without the formal scheduling of a Public Safety Council meeting at Daytona, representatives of each of the organizations in the Council will meet informally at APCO's invitation.

LOS ANGELES COUNTY 800 MHZ PETITION: With the drive of the Los Angeles County Sheriff's Office for additional frequency space for public safety in the area of the spectrum which land mobile radio shares space with UHF television still unresolved at the FCC (a previous December comment date was deferred when the Sheriff's Office suggested an alternative approach), the spectrum needs of other governmental operations in that hard-pressed geography have also been laid before the Commission.

The Los Angeles County Department of Communications has petitioned the FCC to amend Parts 2 and 90 of its rules to provide 1.50 megahertz of spectrum from the so-called 800-900 megahertz "Land Mobile Reserve" bands for its use in the development and implementation of a trunked radio communications system. The Department said its plan for "migration" of its local government public safety radio communications operations ("excluding sheriff, fire and paramedic" operations), contemplates a 20-channel trunked county-wide system for the present and near future, and an additional 10 channels in reserve for planned future growth.

Its requirements, the Department pointed out, are to serve such operations as sanitation, human relations, parks and recreation, health, airports, beaches, maintenance, probation, animal control, marshals, lifeguards, county engineering, roads, social services, the District Attorney's offices, and museums and hospitals.

FCC NOVEMBER 21 ACTIONS: As this issue of the APCO Reports was written, meanwhile, the FCC had not yet released the texts of the documents spelling out the results of its actions on November 21, in a series of proceedings which will dispose of the remainder of the 800-900 megahertz "Land Mobile Reserve" bands. Initial announcements by the Commission following the meeting raised a number of unanswered questions, and those questions still had not been answered in late December. The delay in releasing the texts was due to revisions being made following the November 21 meeting.

For the "Private Land Mobile" Radio Services, which includes public safety, the FCC's initial announcement said the agency is proposing "additional spectrum in the 896-902 and 935-941 megahertz bands".

The new proposal, in Gen. Docket 84-1233, the agency said, also offers a "narrow band channelization plan for this spectrum. Under the proposal, these new channels would be apportioned among four pools as follows: 30 percent for public safety, 20 percent for industrial/land transportation, 20 percent for business radio, and 30 percent for specialized mobile radio systems (SMR's). A regulatory structure would be established for this spectrum similar to that set forth in Subpart S, Part 90, of the rules and currently applied to applicants and licensees of frequencies in the 806-821/851-866 mhz bands."

Since the late 1960's, the Commission said, it "has recognized that without additional allocations there would be a serious shortage of land mobile spectrum before the end of this century," and it has released spectrum since that time in several actions, leading to the present situation where there is only 41 mhz remaining in "reserve". In the November 21 actions, the Commission said, it is proposing (in addition to the 12 mhz for the private land mobile services) additional allocations of 12 mhz for cellular telephone operations, and 8 mhz for a "land mobile satellite service".

On the narrowband question, the agency said, "While most private land mobile services in the U.S. use 25 kilohertz channels, in view of the limited spectrum available, it is proposing a 12.5 khz channeling plan for this new spectrum," but will also consider other channel spacings: 5, 6.25, 7.5, 10 and 15 khz. It asked for comments on "the feasibility of the various channeling plans."

The Commission said while it felt public safety and SMR's should be given priority in distributing spectrum among the various private land mobile users, "adequate allocations also must be made to accommodate special industrial, land transportation and business users who find their needs can best be met by establishing their own communications systems."

The Land Mobile Communications Council, it said, has indicated that the presently available 800 mhz frequencies are at or near full utilization in several urban areas, and that further allocations are necessary to accommodate additional users.

One specific question the agency is asking in the proceeding, it said, is "whether the public safety pool should be larger than proposed." The FCC staff contact for this proceeding is Stuart Overby, phone 202/634-2443, in Washington.

The International Association of Chiefs of Police, with the support of APCO, had asked that the Commission allocate the 821-825/866-870 mhz band to public safety services, but the agency decided at the November 21 meeting that it would propose that this band be allocated for a land mobile satellite service, in Gen. Docket No. 84-1234. In its initial announcement of the action, however, the agency said it is also raising "the issue of an additional--or substitute--allocation at 1.5 gigahertz" for the mobile satellite service. The FCC staff contact for this proceeding is Jacqueline Spindler, phone 202/632-4047, in Washington.

The new notice of proposed rulemaking involving the proposed additional allocation for cellular systems is numbered Gen. Docket 84-1231. The Commission said it "has tentatively proposed to allocate 12 mhz of spectrum in the 845-851 and 890-896 mhz bands" for this service.

"As an alternative allocation" in this proceeding, however, the Commission said it is proposing "dividing 24 mhz of pairable land mobile reserve spectrum into a public safety segment and a general mobile segment, with 3 mhz paired being allocated exclusively to public safety, thereby leaving 21 mhz in the general mobile segment. Such a deviation," it said, "would remove any concern about whether the important communications of public safety agencies will be met adequately through a decentralized allocation mechanism. Licensees in the general mobile spectrum block would be granted exclusive assignments which could be used, in a flexible manner without interference guidelines, for any mobile service using any technology on a primary basis. They would be free to increase the size of their assignments through either outright license transferrals or by the leasing of other licensees' capacity." The FCC staff contact for this proceeding is Rodney Small, phone 202/653-8169, in Washington.

In its other actions on November 21, the Commission said it "has reallocated six megahertz of a spectrum in the 932-935 and 941-944 mhz bands for use by government and non-government fixed services"; it "has decided not to adopt a proposal to allocate 8 mhz of 900 mhz spectrum



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for a new private radio communications service for personal communications use"; it "has denied a proposal to allocate the frequencies 896-898 and 941-943 mhz for use by domestic public land and mobile stations to provide air-ground public radiotelephone services"; and it "has reallocated frequencies in the 944-947 mhz band for aural broadcast studio transmitter links and inter-city relay stations in the 50 states and in the 942-947 mhz band in Puerto Rico." In connection with the latter action, it said it has "also provided for grandfathering existing STL/ICR stations in the 942-944 mhz band and dismissed a proposed allocation of frequencies in the 2130-2150 and 2180-2200 mhz bands for shared STL/ICR use with private operational fixed microwave stations."

LOTTERIES: In another FCC rulemaking proceeding in which APCO has taken an active part, the FCC this month released the text of a "memorandum opinion and order" in Gen. Docket No. 81-768 which contains some language which the APCO membership will hardly appreciate, but which may turn out to be more irritating than harmful. The proceeding is "In the Matter of Amendment of the Commission's Rules to Allow the Selection from Among Certain Applications Using Random Selection or Lotteries Instead of Comparative Hearings."

In its new order, the FCC was disposing of petitions seeking reconsideration or clarification of an earlier order "which authorized the use of random selection or lotteries to choose from among certain competing applications."

The key language in the new order (paraphrased) is: APCO and the Los Angeles County Sheriff's Department raise mutual concerns. First, they are concerned about the implication in the "second report" that a lottery might be used to choose between competing public safety applicants. A lottery will not be used to choose between competing public safety and non-public safety applicants. For competing public safety applications, we will not use lottery procedures when it appears upon initial analysis that there are significant differences in the abilities of competing applicants to serve the public. However, when it appears upon initial analysis that there are no substantial and material differences in the merits of competing applications, we may select licensees by lottery. In this way, lotteries will be used only when comparative procedures would serve no useful purpose. In making this public interest determination whether public safety applications should be subject to a comparative hearing or lottery, we may consider such factors as overall public safety implications, geographic coverage area, population affected, operator experience and spectrum efficiency.