

APCO REPORTS

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The biggest APCO "news" in May has been the signing of an historic agreement with the Federal Emergency Management Agency which is intended to facilitate Federal/State/Local governmental planning processes and result in meaningful improvement of emergency response capabilities throughout the United States. At the same time, APCO has continued its concentration on frequency allocations and frequency coordination rulemakings; its plans to further relationships with and planning for advancements in connection with emergency medical services; and getting ready for the biggest and best Annual Conference ever.

FEMA/APCO "MEMORANDUM OF UNDERSTANDING": The July issue of the APCO BULLETIN will be telling the full story in pictures and words, and we're running the risk of redundancy in this issue of the APCO REPORTS, but we feel this word should be spread far and wide as soon as possible, in the hope that the information will be useful as APCO members and their supporting agencies and allies inform regulatory officials of their positions in connection with on-going proceedings at the Federal Communications Commission.

The culmination of a highly successful APCO East Coast Regional Conference in Williamsburg, Virginia, was the signing of a "Memorandum of Understanding" between APCO and the Federal Emergency Management Agency which looks toward accomplishing many of the things that both organizations are striving vigorously to bring about.

While FEMA Director Louis O. Giuffrida was unable to attend the Williamsburg Conference in person, because the timing of the May 21-23 meeting coincided with his scheduled (and some non-scheduled) appearances on Capitol Hill in connection with his Agency's budget requests, his signing of the "MOU" was video-taped and expressed to the Regional Conference for completion by APCO President Chuck English.

The "Memorandum of Understanding" between FEMA and APCO follows similar agreements which both organizations have individually with the American Radio Relay League, which both look toward further integration of amateur radio capabilities in emergency and disaster planning and operation. It also, hopefully, precedes other agreements relating to emergency medical planning and operations, and closer liaison between APCO and other major organizations of public safety officials.

The FEMA/APCO document, signed May 23, 1985, follows:

"MEMORANDUM OF UNDERSTANDING between THE FEDERAL EMERGENCY MANAGEMENT AGENCY and THE ASSOCIATED PUBLIC-SAFETY COMMUNICATIONS OFFICERS, INC."

"The Federal Emergency Management Agency (FEMA) is the agency of the Federal Government assigned responsibility for the planning, coordination and allocation of resources necessary to assure the safety and welfare of the general public in the event of major disaster or national emergency.

The Associated Public-Safety Communications Officers, Inc. (APCO) is the Nation's oldest and largest national association of public safety communication officials, engineers and technicians. Since its foundation in 1935 APCO has been dedicated to the enhancement of the public safety services through the contributions of telecommunications. It has long been the most effective voice speaking before Federal regulatory bodies on behalf of the spectrum needs of all public safety activities. As the national association of representatives of public safety communications agencies at all levels of government, it has been the unifying force behind the development of standards for operator training, the adoption of common procedures, the preparation of guidelines to aid in cooperative planning and the introduction of new technologies to enhance the coordinated command control of the many activities that contribute to the provision of public safety services.

The FEMA concept for support to State and local preparedness, entitled the "Integrated Emergency Management System" (IEMS) emphasizes capability building for emergency response to all hazards. IEMS is designed to assist States and localities and maintain organization, planning, and operational systems and goals that are achievable and predictable. It involves the capacity to perform emergency management functions throughout the full range of domestic and national security emergencies. The attainment of this capability is directly dependent upon the cooperative and integrated functioning of the communications systems that serve and interconnect these functions.

The more than one million members of the several thousands of public safety agencies at all levels of State and local governments and in corporate and volunteer organizations constitute a national resource of significant dimension. The ability to coordinate and concentrate necessary elements of this resource in times of major disasters or national emergency is directly dependent upon the efficiency and adequacy of communication to meet user requirement and the compatibility of telecommunication systems to interconnect local and State agencies with the national command and emergency management activities.

The rules of the Federal Communications Commission (FCC) under which these communications systems are licensed use of radio frequencies have long compartmentalized the many components of the public safety system into separate "services," each with its own channel assignments, frequency selection and coordination process.

Emergency management, as well as the ever expanding demand on telecommunication capability due to information technology require applications that are more efficient, survivable, reliable and integrated.

As communities establish consolidated Emergency Operating Centers which combine coordinated Public Safety Answering Centers, 9-1-1 systems and more sophisticated public safety communications systems, frequency assignments for public safety activities must be compatible with those of existing and planned activities, both within the same service and with related activities. To this end, APCO has established the first comprehensive, public safety radio frequency assignment data base. This data base is currently being

enhanced through APCO's processes on a national basis.

FEMA and APCO have a common dedication to and responsibility for the continuing development of adequate, cooperative and responsive public safety communication systems. It is entirely proper, therefore, that these organizations work together, to the extent individually deemed appropriate, for the attainment of these national beneficial goals.

UNDERSTANDING

1) FEMA and APCO recognize that an effective communications capability is fundamental to the provision of efficient and reliable public safety services in times of national emergency or major disaster. Both agencies agree that the use of recognized communications procedures; the implementation of coordinated communications systems; the allocation of adequate, contiguous spectrum; the development of cooperative emergency plans; and the application of mutually supportive, operationally effective technologies are necessary to the development of such communications capabilities.

2) APCO, as the principal entity in the coordination of public safety frequency license applications, will, to the extent permitted by its authority and resources, support FEMA initiatives with regard to national telecommunications plans and policies, and with regard to FEMA assistance and guidance to State and local governments to enhance emergency management capability.

3) Under the aegis of its Project Series Foundation, APCO has developed guidelines for statewide and local level telecommunications system planning. APCO's Project 16 has provided the conceptual basis for the introduction of systems that make possible improved interagency cooperation. APCO will continue to actively support the use of these guidelines and the introduction of such systems to contribute to the enhancement of interagency and inter-governmental level cooperation.

4) APCO will continue to support the establishment of public safety, local advisory, frequency coordinating committees to support the implementation of the communications aspects of emergency management. It will work with FEMA to disseminate to these committees appropriate communications related policies and information that may assist these committees in making recommendations that support the development of noninterfering, cooperative, public safety communications networks.

5) APCO will, to the extent its resources permit, continue to develop and maintain current a national, comprehensive, public safety frequency assignment data base. FEMA and APCO will continue to work toward the establishment of coordinated processes for emergency radio license application review to maximize interservice cooperation and continuity of public safety communications system implementation policy.

6) FEMA recognizes that APCO is the major voice representing public safety communications interests before Federal regulatory bodies. In those proceedings in which FEMA perceives an interest, APCO and FEMA will discuss their positions with each other to ensure that the maximum degree of mutual understanding and cooperation is achieved.

This document shall remain in effect until formally terminated by either party.

HAZARDOUS MATERIALS EMERGENCIES: The Federal Emergency Management Agency has put APCO members (and others) on alert for a nationwide teleconference on issues in planning for hazardous materials emergencies, to be aired on June 25, 1985. The telecast will originate from Washington, and will be transmitted via the Westar V satellite to State and local officials involved in hazardous materials planning nationwide. It will be produced by FEMA's Emergency Management Institute, and is the first in a series of seven planned by FEMA's Emergency Education Network (EENET) for the coming year.

The June 25 teleconference is being co-sponsored by FEMA and the National Response Team (NRT), which is an interagency group charged with coordinating Federal response to hazardous materials incidents, and will focus on case studies illustrating how communities are building working relationships among the variety of local public and private organizations with hazardous materials-related responsibilities, including the roles of the transportation industry and the State and Federal governments in the planning process.

The program will be divided into three segments: on-the-air discussions from 11 a.m. to 12:50 p.m. and from 2:30 p.m. to 4 p.m. (Eastern Daylight Time), and middle segments providing an opportunity for officials from various disciplines to exchange information about their respective roles and responsibilities in hazardous materials planning. The audience -- city and county managers; officials from fire, police and emergency services; environmental and public works officials; and emergency managers-- will be able to participate in discussions and ask questions of teleconference speakers via a toll-free ("800") telephone number.

Information and instructions for establishing a local downlink are available from teleconference coordinators in each FEMA Regional Office.

FREQUENCY ALLOCATIONS: Since you received the April, 1985 issue of this publication, the FCC has extended the date for filing "reply" comments in its General Docket Numbers 84-1231, 84-1233 and 84-1234, which collectively contemplate the allocation of the remaining frequencies in what has been known as the 800 MegaHertz "land mobile reserve" frequency band. The new "reply" comment date is June 5, so you still have time to get support into the FCC from your department or responsive figures in Washington for the position expressed in these proceedings by APCO, the Public Safety Communications Council, supporting members of Congress, and other major organizations of public safety officials.

The FCC received a large number of initial comments in response to these proposals, and after reviewing these filings, APCO is preparing to submit "reply" comments which include the following statements:

"APCO has no quarrel with those who favored in their comments the Commission's tentative proposal to allocate twelve MegaHertz of spectrum in the 845-851 and 890-896 MHz bands for use by common carrier cellular radiotelephone systems in Gen. Docket No. 84-1231 -- if the Commission allocates the 821-825 and 866-870 MHz bands to the Public Safety Radio Services.

"Similarly, APCO has no quarrel with those who favored in their comments the allocation of frequencies in the 896-902 and 935-941 MHz bands for non-Public Safety Private Land Mobile Radio Services in Gen. Docket No. 84-1233-- if the Commission allocates the 821-825 and 866-870 MHz bands to the Public Safety Radio Services.

"However, APCO does take strong issue with those who favor in their comments the allocation of the 821-825 and 866-870 MHz bands to a proposed new common carrier Mobile Satellite Service (MSS) in Gen. Docket No. 84-1234, and points out in these reply comments that the profit-seeking advocates of such a service have fallen far short of justifying the denial of these frequencies to the Public Safety agencies of this country and the United States Citizens they serve. . .

"(APCO urges) that the Commission accept its Congressional mandate to take into account the needs of State and local Public Safety authorities on a first priority basis in making allocations of the electromagnetic spectrum, while considering "suitable and commercially available equipment," and Public Safety requirements for "adequate contiguous spectrum."

In response to allegations by the National Aeronautics and Space Administration that the proposed new "MSS will provide support for rural Public Safety services," APCO replied that "This statement is not supported by factual data, research, or comments submitted by representative Public Safety organizations. To the contrary, every representative Public Safety activity of the contiguous United States which commented on this point, while voicing no objection to the MSS concept per se, vehemently opposed allocation of the 821-825/866-870 MHz spectrum for non-Public Safety purposes. . ."

With respect to the Commission's proposal that Public Safety be allocated frequencies higher in the spectrum, rather than the 821-825/866-870 MHz band, APCO stressed that "The cost of newly developed equipment, produced solely for a limited, single band, 896-902/935-941 MHz market, would impose an unconscionable burden upon the millions of urban taxpayers, both in terms of dollars and of the everlasting, operational obstacles created by non-compatible systems. . .As pointed out by the majority of respondents in these proceedings . . .a move of future Public Safety assignments to the 896-902 MHz portion of the band would constitute a devastating operational, technological and economic blow to the hoped-for resolution of the well-known communications problems of the Public Safety Services."

NATIONAL RESEARCH COUNCIL: APCO First Vice President Joe Nasser and APCO Executive Director Bob Tall, who made a presentation to the National Research Council's Committee on National Security Telecommunications Policy Planning Environment in Washington on March 6, have been invited back to participate in a round-table discussion of that Committee specifically devoted to Public Safety radio frequency allocations. Also participating in the discussions will be representatives of the FCC, FEMA, the Interdepartment Radio Advisory Committee, and the National Communication System, among other organizations.

FREQUENCY COORDINATION: With the June 10 deadline for "reply" comments looming in the FCC's frequency coordination rulemaking proceeding in PR Docket Number 83-737, APCO members, supporters and allies still have time to put together a supporting statement for our position, if they have not already done so.

Every APCO Chapter was asked to contribute its thoughts with respect to this proceeding, and a regionally representative Task Force appointed by President Chuck English formulated the key points that make up the association's position in this proceeding, which was printed in large part in the April issue of the APCO BULLETIN.

APCO has requested that it be certified by the FCC as "the Coordinator" for all of the Public Safety Radio Services, including the Special Emergency Radio Service, and has laid out its plan to create and enhance a total Public Safety radio data base to serve as the cornerstone for frequency coordination in all of the Public Safety services.

As the time for submitting "reply" comments draws near, it appears that the principal points of support for APCO's position that are most necessary are: (1) APCO is the only organization truly representative of all of the Public Safety communications services across-the-board; (2) APCO is the only Public Safety communications organization which has taken an active role in working with Federal authorities and agencies in researching problems and recommending comprehensive solutions to emergency response capability problems; (3) APCO is the most experienced frequency coordinating body among all such organizations, and has been the only such organization dedicated to providing such service truly at the local level; (4) APCO's members, and thus its operations, have been for 50 years, and still are, oriented toward Public Safety communications, in contrast to some of the other organizations whose principal interests have been in other, non-communications areas; (5) APCO is the only Public Safety organization which has requested certification as "the Coordinator" in all of the Public Safety services in order to operate from a consolidated data base, and the operation and maintenance of a single, unified Public Safety data base will be obviously less costly to the taxpayers who must ultimately bear the costs of frequency coordination in these services; (6) APCO's organizational structure, with its system of checks and balances, ensures that the frequency coordination service for the Public Safety communications field will be provided in the most expeditious fashion, and for the least possible cost to the end user, commensurate with the degree of expert evaluation necessary at the local level to ensure non-interfering yet compatible communications services to emergency response operations.

SPREAD SPECTRUM: In one of its latest actions affecting the Public Safety Radio Services, the FCC May 24 released the text of a "First Report and Order" in Gen. Docket 81-413, in which the Commission has approved a limited authorization for the use of "spread spectrum" systems in the Public Safety and Industrial, Scientific & Medical (ISM) Services bands. In a separate action, in Gen. Docket 81-414, the agency authorized Amateurs to develop, test and operate spread spectrum systems.

We had not received a copy of the full text of the First Report and Order as this issue of APCO REPORTS was mailed, but an initial announcement by the Commission pointed out that authorization of spread spectrum systems will be limited to law enforcement officers under Part 90 of the rules and as low-powered, limited-range devices under Part 15 of the rules. The rules also will allow spread spectrum operations in the 902-928, 2400-2483.5 and 5725-5875 MHz ISM bands.

In its initial report, the Commission said: "With spread spectrum, law enforcement agencies will be able to set up communications links to be used in physical surveillance, stakeouts, raids and other activities, without detection by criminal elements that may be monitoring the airwaves. However, operations will be on a non-interference basis to the operations of other licensees who have been authorized the use of these frequencies under other Part 90 sections. In addition, police use of the frequencies will be subject to approval of the Public Safety Radio Service frequency coordinator for the district in which the license and equipment are to be used; if non-police Public Safety frequencies are to be used, they must be coordinated with other services. Initially, only the frequency hopping form of spread spectrum will be allowed. . ."