



5-18-88

# APCO FREQUENCY COORDINATION DEPARTMENT

P.O. Box 280 • New Smyrna Beach, Florida 32070 • 904-427-3461

---

9 May 1988

MEMORANDUM

TO: NATIONAL EXECUTIVE COMMITTEE MEMBERS  
PRIMARY LOCAL FREQUENCY ADVISORS  
ALTERNATE LOCAL FREQUENCY ADVISORS  
CHAPTER PRESIDENTS

FROM: CHARLES F. ENGLISH, DIRECTOR OF APCO AFCS *CFE*

RE: FREQUENCY COORDINATION POLICIES/PROCEDURES - IMSA COMPLAINT

At the direction of the Board of Officers, this packet of information is being sent to you in order that you might better understand what we are doing in the Frequency Coordination Department, how we are doing it, and why some of the recent action taken by the Board and the National Executive Committee was necessary.

The "AFCS PROCEDURES" is being sent for general information purposes. It should be remembered that procedures will change in the near future as we move more and more into an automated process. The responsibilities outlined will remain the same, however.

The "FREQUENCY COORDINATION POLICY" was developed in order for APCO to be able to assure compliance with the mandate of FCC Docket 83-737 that 90% of applications be accomplished within twenty (20) working days.

The "APCO AFCS POLICY FOR STATUS 5" was developed to prevent the Local Frequency Advisor from being penalized for those applications which required additional information from the applicant, and to prevent applications from being allowed to "stagnate" and build up time on the clock thereby preventing compliance with the 20-day requirement.

The packet concerning the official complaint filed with the Federal Communications Commission by IMSA is for your information. It will give you insight into the pressure APCO is receiving now to bring our process into compliance.

Your understanding of the APCO frequency coordination process will enable you to assist us in establishing better rapport with those we are trying to serve, both within and without APCO. Thank you in advance for that assistance.

cc: Board of Officers  
Bob Tall

## AFCS PROCEDURES

### I. INITIAL PROCESS AT NATIONAL AFCS OFFICE

Upon receipt at the National AFCS Office an application will be screened for (1) technical competency, and (2) fiscal requirements. Failure to meet these requirements will result in the application being returned to the applicant with an explanation of deficiencies.

The application, if acceptable, will be routed to the processor for the region involved. The processor and/or processor's aide will log the application in; assign a Master ID number and make copies for fiscal data entry clerk and for the application data entry clerk. A file folder will be prepared showing date of receipt, Master ID number and processing date. The original application and any supporting documentation will be placed in the folder and filed alphabetically by applicant's name under the State involved.

The fiscal data entry clerk will enter the information in the fiscal data file and record payment (if any) or generate a billing invoice.

The application data entry clerk will enter the information on a floppy disk which will be uploaded to CET into the local frequency advisors application file.

### II. LOCAL FREQUENCY ADVISOR PROCESS

The local frequency advisor will receive a computer generated E-Mail message notification of a new application. When the application is displayed, the status

is changed from Status 1 (New Application) to Status 2 (Acquired by Local Advisor). When the local advisor begins to process the application, he upgrades the Status to 3 (Coordination in Progress). Applications are not to be left in Status 2 longer than 3 days. Status 4 (Awaiting Adjacent Channel/Adjacent State Concurrence) will be entered if appropriate.

Status 5 (Awaiting Applicant Information) will be entered to indicate applicant has been notified by the local frequency advisor that additional information, or letter of concurrence from existing licensees, is required.

Status 6 (Withdrawn/Inter-Service Request Denied) will be entered in cases when (1) the applicant withdraws the application, or (2) when APCO cannot concur with a request from another radio service coordinator.

Status 7 (Approved as Submitted) will be entered by the local advisor to indicate the application is approved as submitted with no changes in technical parameters. The local advisor will then send the National AFCS Office (NAPCO) an E-Mail message identifying the application by Master ID number (it is well to also include the name of the applicant as a double check for identification purposes). This message will state "approved as submitted".

Status 8 (Approved with Changes) will be entered by the local advisor to indicate the application is approved with changes in the technical parameters.

The local advisor will then send NAPCO an E-Mail message identifying the application by Master ID number (and Name of Applicant). This message will state "approved with the following changes" and will include an itemized list of all changes and/or special conditions required for approval.

The local frequency advisor's involvement with the application is completed at this point. CET periodically flags the application into the Master Database as a pending application.

### III. FINAL NAPCO PROCESS

Upon receipt of an E-Mail message (either Status 7 or 8) from the local advisor, the NAPCO regional processor (or processor's aide) will remove the folder from the file, reconcile the original document with the local frequency advisors changes (if any), and enter the date the E-Mail reply was received in the status record on the file folder.

The regional processor will then screen the application to determine if Inter-Service action is required. If required, a copy of the FCC Form 574 is made and sent to the other service(s) involved. An entry is also made in the status record on the folder indicating the service(s) it was sent to and the date it was sent.

If no Inter-Service action is involved, or upon receipt of concurring responses from other service(s), the application is stamped with APCO's Certification Stamp

showing date submitted to the FCC, listing other service(s) involved, and a statement of any rule section involved in a waiver or Inter-Service sharing action taken. Pertinent dates are entered in the status stamp on the file folder.

Should Inter-Service request(s) be denied, or be approved subject to changes, the local frequency advisor is contacted and is again involved until the application is modified to the satisfaction of the other radio service coordinator(s). The application is stamped for submittal to the FCC as described above.

In all cases, applications prepared for submittal to the FCC are copied with a copy going to the applicant, a copy to CET, and a copy for the file. The original application, with any pertinent supporting documentation, is placed in the outgoing mail to the FCC and a record of the date is entered on the file folder and on a daily transaction log.

The CET copy is used to confirm the data previously entered in the Master Database. The frequency coordination process is now completed.



# APCO FREQUENCY COORDINATION DEPARTMENT

P.O. Box 280 • New Smyrna Beach, Florida 32070 • 904-427-3461

---

28 April 1988

MEMORANDUM

TO: CHAPTER PRESIDENTS  
NATIONAL EXECUTIVE COMMITTEE MEMBERS  
LOCAL FREQUENCY ADVISORS - PRIMARY  
LOCAL FREQUENCY ADVISORS - ALTERNATES

FROM: CHARLES F. ENGLISH - DIRECTOR APCO AFCS *C.F.E.*

RE: FREQUENCY COORDINATION POLICY

As recommended by the National Board of Officers of APCO, and as approved by the National Executive Committee at its interim meeting at the North Central Regional APCO Conference in Muskegon, Michigan on Monday 18 April 1988 the following Frequency Coordination Policy is submitted for your information and compliance.

## FREQUENCY COORDINATION POLICY

To meet the twenty (20) day goal for each coordination mandated to APCO by the FCC, the Board of Officers has found it necessary to adopt the following policy with respect to average days on system (coordinator days).

Effective June 1, 1988, any APCO Frequency Advisor whose monthly C.E.T. "REPORTS" indicate that his/her average days on system exceeds ten (10) working days (fourteen (14) calendar days excluding federal holidays) for two (2) consecutive months shall be placed on probation and given thirty (30) days to comply. Notification of probation will be sent to the Chapter Executive Committee Representative, the Chapter President, and the local Frequency Advisor(s) and Alternate(s). Failure to comply with this or any other stated policy will result in the removal of coordination authority from the chapter.\*\* This removal will continue until such time that the chapter can present evidence of necessary resources that will enable them to resume coordination authority in compliance with the above policy. This determination, in addition to the administration of this policy, shall be the responsibility of the Director of Frequency Coordination.

Your cooperation on this important matter is appreciated and vital for the success of APCO's frequency coordination operation. Thank you in advance for your help.

\*\* In chapters with more than one local frequency advisor, e.g., the Northwest Chapter has two, the intent is to remove coordination authority in the area covered by the affected local frequency advisor found to be in non-compliance.



# APCO FREQUENCY COORDINATION DEPARTMENT

P.O. Box 280 • New Smyrna Beach, Florida 32070 • 904-427-3461

28 April 1988

## MEMORANDUM

TO: CHAPTER PRESIDENTS  
NATIONAL EXECUTIVE COMMITTEE MEMBERS  
LOCAL FREQUENCY ADVISORS - PRIMARY  
LOCAL FREQUENCY ADVISORS - ALTERNATES

FROM: CHARLES F. ENGLISH - DIRECTOR APCO AFCS *CFE*

RE: APCO AFCS POLICY FOR STATUS 5

As recommended by the National Board of Officers of APCO, and as approved by the National Executive Committee at its interim meeting at the North Central Regional APCO Conference in Muskegon, Michigan on Monday 18 April 1988 the following policy dealing with the use of "STATUS 5" is submitted for your information and compliance.

### APCO AFCS POLICY FOR STATUS 5

On December 9, 1987, President Al Lannier wrote a Memo to the AFC Office, Frequency Coordinators, Frequency Coordination Alternates, the Executive Committee, and the Board of Officers. This Memo was intended to establish policy dealing with applications which were "bogged down" in the system due to the need of some additional technical information or supportative documentation from the applicant. Included with the memorandum was a copy of a Return Notice to be used when returning the application to the applicant.

It appears that the policy established in that Memo is not being followed, and some local frequency advisors have reported they never received it. Therefore, the Board has discussed the matter further and has established the following policy to assure that local advisors do not allow Status 5 (Awaiting Applicant Information) applications to 'stagnate' in the system.

Upon placing the application in Status 5, the local advisor will contact the applicant and advise him/her of the additional information required. This initial contact will be confirmed in writing to the applicant (signor of the FCC form) with a copy to the National AFCS Office. This contact, and confirming written notice will include:

1. The date the application was put into Status 5 and that the processing "clock" was stopped at that point;
2. The applicant will be given three (3) calendar weeks to provide the necessary additional information and that failure to comply within the prescribed period will result in dismissal and return of the application.

The National AFCS Office (NAPCO) will be notified by E-Mail of the action taken and the date it was done.

Upon receipt of the additional necessary data from the applicant, the local fre-

quency advisor will notify NAPCO by E-Mail to "restart" the clock including the effective date. The local advisor will then change the Status to the appropriate code and proceed with application processing.

Should the applicant fail to submit the additional information (or fail to contact the local frequency advisor for an extension of time) the local frequency advisor will notify NAPCO to return the application to the applicant due to non-compliance.

NAPCO will then return the application with suitable resubmittal instructions.

Attachment: Copy of form letter to be used by the local frequency advisor to notify applicant of action being taken



# APCO FREQUENCY COORDINATION DEPARTMENT

P.O. Box 280 • New Smyrna Beach, Florida 32070 • 904-427-3461

---

DATE: \_\_\_\_\_

TO: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

RE: APPLICATION, MASTER ID NO. \_\_\_\_\_

Dear \_\_\_\_\_:

This is to confirm our conversation today regarding the need for additional information or data before we can proceed with processing your application.

Specifically, the information we need is: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

This action stops the "clock" which is used to determine APCO's processing time as established in FCC Docket 83-737 and puts your application on hold. In addition, this is to advise you that unless we receive this additional data within three (3) calendar weeks from the above date your application will be removed from our system, dismissed and returned to you. Should that occur, it would be necessary for you to resubmit a new application with the necessary data and begin the entire process anew.

Should you have questions regarding this matter, please do not hesitate to call me at telephone \_\_\_\_\_.

Sincerely,

Local APCO Frequency Advisor

cc: NAPCO



# APCO FREQUENCY COORDINATION DEPARTMENT

P.O. Box 280 • New Smyrna Beach, Florida 32070 • 904-427-3461

---

29 April 1988

Mr. W. Riley Hollingsworth  
Federal Communications Commission  
Private Radio Bureau, Compliance Branch  
Room 5202  
2025 M Street, N.W.  
Washington DC 20554

RE: 7320-09/L2544

Dear Sir:

This is in response to your letter to me dated April 5, 1988, received at this office April 12, 1988, regarding the complaint filed with the Commission by Alfred J. Mello dated February 8, 1988.

APCO appreciates the Commission's concern with respect to the time it has taken to process requests for frequency coordination under the new rules which went into effect on October 22, 1986. However, APCO believes it has diligently worked toward having in place a system of coordination unlike any other system previously known to the Commission, and one which retains the virtue of providing public safety applicants systems which are as "interference free" as possible yet provides maximum re-use of each radio channel assigned to the services for which APCO coordinates.

The fact that APCO's system does not yet meet the very tight demands of the Report and Order in Docket 83-737 in all respects warrants little adverse criticism in APCO's direction: substantial progress has been made, and concrete steps have been taken to bring the system into full compliance with the Commission's "speed of service" mandates.

Unlike the recognized coordinators which have had fully automated coordination systems in operation for many years, APCO has had to convert a nationally representative system of local frequency advisors working principally on a manual-file basis, into a cohesive automated, centrally controlled system. Unlike at least one other public safety coordination organization, APCO has elected to base its system on more of an engineering approach than the simpler approach of merely checking the use of a frequency on a flat mileage basis and certifying it as "coordinated". Unlike coordination organizations which operate strictly from a "records" and "mileage" standpoint, APCO's process involves an attempt to persuade an existing user to modify the technical parameters of an existing system in order that both the existing user of a channel and the prospective new user of that channel may both occupy the channel without diminished capability to carry out the safety of life and property missions of the applicant agencies.

While APCO, which believes it has been in the frequency coordination "business" longer than any other of the coordinating groups recognized by the Commission, firmly believes that its system of making use of local frequency advisors provides the highest quality coordination service, APCO fully understands that it does not have a "blank check" insofar as the time it requires for its processes, and is striving to bring its "speed of service" within the limits established by the Commission. Its performance in recent months, particularly in the interservice sharing and concurrence processes, which is the specific subject of the Commission's instant complaint, is testimony to that.

APCO did not wait for the Commission to notify it of complaints. Unlike some of the other coordinating organizations, APCO remains controlled by a structure in which elected members of each of its 42 Chapters, serving along with the National Board of Officers, constitute a National Executive Committee which is outranked in the organization only by the diverse body of members, which numbers approximately 6500. It is the National Executive Committee which must approve the expenditure of funds and establish policy for the organization. The National Executive Committee meets twice annually.

At its first meeting (in August, 1987) following the October 22, 1986 effective date of the Report and Order in Docket 83-737, the National Executive Committee, through the APCO Board of Officers, identified a number of deficiencies in the APCO coordination process, and designated a Select Committee to recommend further staffing, salary and training requirements of the APCO Frequency Coordination Department, looking toward a structure and personnel complement that would meet the Commission's "speed of service" requirements. At its second meeting (in April, 1988), the National Executive Committee authorized the steps which the Select Committee (and others) had identified to bring the APCO system into compliance.

These steps include both staffing requirements and new policy initiatives, and are spelled out in more detail below and in the attachments to this letter. In brief, they include increasing the APCO Frequency Coordination Department staff by five full-time positions, a staff increase of 55%; increasing APCO's expenditures for contract data management services by \$120,000 a year, an increase of 60% to be devoted to further automation of APCO's processes; and establishing firm policies under which local frequency advisors will be quickly removed from the system if their portions of the overall APCO processing times exceed the times allotted to them.

Other improvements authorized by the National Executive Committee include enhanced communications with applicants for APCO coordination service; an expanded system of record-keeping, particularly with respect to interservice sharing and concurrences; an improved system for keeping the public aware of APCO's coordination processes; and strengthened internal APCO procedures for monitoring the processes.

It is significant to point out with respect to interservice sharing and concurrences, that APCO's time for the handling of such requests filed with APCO is substantially less than the average time which is required for the handling of such requests which APCO submits to others. APCO is also in the process of

building a case history of instances where the interservice sharing/concurrence procedures called for in the rules is being ignored and/or otherwise bypassed.

It is also significant to point out with respect to APCO's coordination work as a whole, that the law enforcement and integrated local government radio service systems which APCO handles, are far larger and more complex than most of the radio systems for which other frequency coordination organizations are recognized by the Commission. This factor comes into play particularly when APCO has to enter multi-page applications in cases where only minor system changes are being contemplated, in an effort to improve the data base which is available from the Commission. Also, APCO's work is further being complicated by the lack of an adequate Commission method for keeping APCO informed as to transactions being made at the Commission with respect to frequencies about which APCO has a "need to know" from the interservice sharing, or concurrence standpoint.

I will use the same chronological order you used in answering your specific questions.

#### REASONS FOR DELAY

##### HILLSVILLE VOLUNTEER FIRE DEPARTMENT. (Hillsville, VA)

This request, dated 9-2-87, was received at APCO 9-7-87. It requested 39.10, 39.18, 39.50, and 39.98 (all assigned jointly to PL and PP) for interservice sharing under 90.176. APCO could not clear the frequencies, disapproved the request, and returned it to IMSA on 9-29-87. I do not accept this particular complaint as being valid, but rather suggest it may indicate a failure to keep adequate tracking records in Mr. Mello's frequency coordination process.

##### CITY OF ALPENA, MI

This request, received 9-7-87, was sent to our local frequency advisor on 9-15-87 (via mail as non-fee interservice requests were not being entered into our automated process at that time). This request apparently "fell into a crack" and did not resurface until IMSA sent a "2nd" (no record of a "1st") Reminder on 1-21-88. This was received at APCO on January 25, 1988; verbal approval was obtained by phone and approval was sent to IMSA on 2-2-88. I consider this a legitimate complaint and have no "reason" other than the "bugs" that were still not worked out of the system at that time plus inadequate staff at APCO's frequency coordination office.

##### SUNFLOWER COUNTY RESCUE UNIT (Indianola, MS)

This request was for interservice sharing under 90.176 for 46.56. It was received at APCO 10-20-87; sent to local frequency advisor on 11-2-87. We checked on the status on 1-27-88; cleared and sent approval to IMSA on 2-2-88 (the day before the complaint was dated). I accept this as a valid complaint and offer no excuse except as noted above regarding Alpena, MI.

BOSTON FIRE DEPARTMENT (MA).

This was a request for interservice co-channel clearance of 453.650. I am unable to determine date APCO received the application so I will accept 5-8-87 as date it was sent to APCO making receipt sometime around May 12 to 15. It was caught in a heavy backlog of interservice requests from all services and was not put into the system until 12-15-87. Approval was received 12-26-87 and it was returned to IMSA 1-7-88. APCO was completely "swamped" in applications in the April - May - June - July period of 1987. We had to work on one backlog at a time and every one broken up created others farther along in the process.

BORO OF MIDDLETOWN, PA

This application was sent twice - on May 7, 1987 and on 12-23-87. The first time it was caught in a heavy backlog and a change of local frequency advisors resulting in a "misplaced" application. It was re-sent on December 23, 1987 and entered as a new application. When it was finally cleared it was determined that a duplication was involved and the first (5-7-87) submittal was approved and returned to IMSA on 3-3-88.

ANALYSIS OF SPEED-OF-SERVICE

Your letter specifically requested speed-of-service for the period December 1, 1987 through February 29, 1988. Our database management was not keeping separate tracking for interservice until the first of January 1988. Therefore, I called Mr. Peter Daronco of your office today and requested permission to report for the period of 1 January 1988 through 31 March 1988 instead of the period you had specified and he advised that would be permissible. All days are calendar days.

You will note that I am including a report both on requests coming to APCO and on requests originating from APCO for comparison purposes.

January 1987 (INTERSERVICE REQUESTS COMING TO APCO)

TOTAL COMPLETED -----	125	
DAYS ON SYSTEM (average) ---	41.3	
COMPLETED IN 20 DAYS (calendar) OR LESS -----	24	19.2%
COMPLETED IN 21 to 30 DAYS -----	17	13.6%
COMPLETED IN 31 to 50 DAYS -----	57	45.6%
COMPLETED IN 51 to 70 DAYS -----	9	7.2%
COMPLETED IN 71 to 90 DAYS -----	17	13.6%
COMPLETED IN 91 DAYS OR MORE -----	1	0.8%

FEBRUARY 1988 (INTERSERVICE REQUESTS COMING TO APCO)

TOTAL COMPLETED	-----118	
DAYS ON SYSTEM (average)	-----30.9	
COMPLETED IN 20 DAYS OR LESS	-----53	----- 44.9%
COMPLETED IN 21 to 30 DAYS	-----25	----- 21.1%
COMPLETED IN 31 to 50 DAYS	-----24	----- 20.3%
COMPLETED IN 51 to 70 DAYS	----- 5	-----  4.2%
COMPLETED IN 71 to 90 DAYS	----- 5	-----  4.2%
COMPLETED IN 91 DAYS OR MORE	----- 6	-----  5.1%

MARCH 1988 (INTERSERVICE REQUESTS COMING TO APCO)

TOTAL COMPLETED	-----110	
DAYS ON SYSTEM (average)	-----31.1	
COMPLETED IN 20 DAYS OR LESS	-----53	----- 48.1%
COMPLETED IN 21 to 30 DAYS	-----31	----- 28.1%
COMPLETED IN 31 to 50 DAYS	-----11	----- 10.0%
COMPLETED IN 51 to 70 DAYS	----- 9	-----  8.1%
COMPLETED IN 71 to 90 DAYS	----- 1	-----  0.9%
COMPLETED IN 91 DAYS OR MORE	----- 5	-----  4.5%

JANUARY 1988 (INTERSERVICE REQUESTS ORIGINATING FROM APCO)

TOTAL COMPLETED	-----120	
TOTAL DAYS (average)	-----137.9	
COMPLETED IN 20 DAYS OR LESS	---- 0	-----  0.0%
COMPLETED IN 21 to 30 DAYS	---- 1	-----  0.8%
COMPLETED IN 31 to 50 DAYS	---- 7	-----  5.8%
COMPLETED IN 51 to 70 DAYS	---- 24	-----20.0%
COMPLETED IN 71 to 90 DAYS	---- 22	-----18.3%
COMPLETED IN 91 DAYS OR MORE	---- 66	-----55.0%

FEBRUARY 1988 (INTERSERVICE REQUESTS ORIGINATING FROM APCO)

TOTAL COMPLETED	-----182	
TOTAL DAYS (average)	-----128.6	
COMPLETED IN 20 DAYS OR LESS	---- 6	-----  3.2%
COMPLETED IN 21 to 30 DAYS	---- 1	-----  0.5%
COMPLETED IN 31 to 50 DAYS	---- 38	-----20.8%
COMPLETED IN 51 to 70 DAYS	---- 24	-----13.1%
COMPLETED IN 71 to 90 DAYS	---- 23	-----12.6%
COMPLETED IN 91 DAYS OR MORE	---- 90	-----49.4%

MARCH 1988 (INTERSERVICE REQUESTS ORIGINATING FROM APCO)

TOTAL COMPLETED	-----161	
TOTAL DAYS (average)	-----126.8	
COMPLETED IN 20 DAYS OR LESS	---- 7	-----  5.5%
COMPLETED IN 21 to 30 DAYS	---- 6	-----  3.7%
COMPLETED IN 31 to 50 DAYS	---- 22	-----13.6%
COMPLETED IN 51 to 70 DAYS	---- 22	-----13.6%
COMPLETED IN 71 to 90 DAYS	---- 19	-----11.8%

29 April 1988  
Mr. Hollingsworth  
Page 6

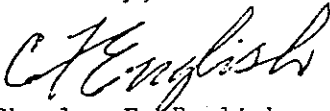
COMPLETED IN 91 DAYS OR MORE ----- 83 ----- 51.5%

While the foregoing does not show APCO in full compliance with the Commission's requirements in responding to interservice requests from other coordinating organizations, it does indicate much progress has been made during the period of this report.

In light of the progress already made together with the adjustments in staffing and measures to better control the process which have been approved by the National Executive Committee I have discussed the time frame for anticipated full compliance with APCO Executive Director Bob Tall and we agree that APCO should be in compliance with 90% of such requests being returned to the originating coordinator within the Commission's prescribed time frame of twenty (20) working days by 1 August 1988.

I trust this adequately responds to your questions in this matter. If you have further questions, however, I will be glad to discuss them with you.

Sincerely,



Charles F. English  
Director, APCO Freq. Coord. Dept.

cc: Board of Officers  
Bob Tall

FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON, D.C. 20554

APR 5 1988

IN REPLY REFER TO:

7320-09/L-2544

Mr. Chuck English  
Associated Public-Safety  
Communications Officials, Inc.  
P. O. Box 280  
New Smyrna Beach, Florida 32070

Dear Mr. English:

Enclosed is a copy of a complaint concerning APCO filed with the Commission by the Fire and Special Emergency Radio Service Frequency Coordination Committees. This complaint concerns APCO's poor speed-of-service performance on interservice sharing and concurrence requests. The complainant has attached a list of the most egregious cases.

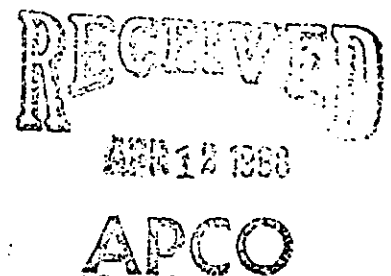
Please explain the reason(s) for the delay in each of these cases.

As you know, the Commission has continued to receive a number of complaints over the past few months regarding APCO's speed-of-service performance. APCO represented in its November 6, 1987, reply to our audit letter that it was striving to meet the Commission's requirement of 90 percent of all applications being completed in twenty or less working days. APCO also stated that it would "be substantially at that goal in another six-month period".

In view of the foregoing, please submit a detailed analysis of APCO's speed-of-service performance for the period December 1, 1987 through February 29, 1988. If your analysis reveals that APCO is still not in compliance with the requirements of paragraphs 27 and 28, and note 14 of our April 22, 1986 Report and Order, please submit details of your specific plan(s) for bringing APCO into compliance. Be sure to include a timetable.

Please respond within thirty days to the address below:

Federal Communications Commission  
Private Radio Bureau, Compliance Branch  
Room 5202  
2025 M Street, N.W.  
Washington, D. C. 20554



Sincerely,

*W. Riley Hollingsworth*  
W. Riley Hollingsworth  
Chief, Compliance Branch

Enclosure

# Fire Radio Service Frequency Coordination



P.O. Box 1513  
Providence, RI 02901  
Tel. (401) 738-2220



International Municipal Signal Association  
**RECEIVED**

International Association of Fire Chiefs

APR 12 1988

APCO

February 8, 1988

PD  
L-2544  
FRSFC/APCO  
3-20-88  
FEB 16 7 41 AM '88  
RECEIVED  
PRIVATE RADIO DIVISION

Richard J. Shiben, Chief  
Land Mobile and Microwave Division  
Private Radio Bureau  
Federal Communications Commission  
2025 "M" Street, N.W.  
Washington, D.C. 20554

Re: Interservice Coordination

Dear Dick:

This confirms our recent telephone conversations on requests for interservice sharing and concurrences. Particularly, we discussed the difficulties the Fire and Special Emergency Radio Service Coordinating Committees have experienced in receiving timely responses to interservice sharing and coordination requests. Enclosed is a summary of the most egregious examples of delay.

As you know, Dick, the Fire Radio Service and the Special Emergency Radio Service Coordinating Committees have invested substantial time, energy, and resources in meeting the objectives of the Commission's Report and Order in Docket 83-737: automated operations, meeting the twenty (20) day maximum for processing turnaround and establishing a "single nationwide point of contact." As disclosed in our report filed in November 1987, our speed-of-service for coordination and action on interservice coordination and concurrence requests meets, if not exceeds regularly, the 20-day response time criterion.\*/

We have not received the same level of responsiveness on requests for interservice coordination and interservice sharing which we direct to other Public Safety, coordinating committees -- particularly, the Police and Local Government Coordinator, APCO, the Highway Maintenance Radio Service

\*/ Attached is a snapshot of IMSA's/IAFC's recent interservice coordination efforts.



## Fire Radio Service Frequency Coordination

P.O. Box 1513  
Providence, RI 02901  
Tel. (401) 738-2220



International Municipal Signal Association

International Association of Fire Chiefs

Coordination, AAHSTO. Furthermore, IMSA/IAFC have been embarrassed by complaints from Fire Service and Special Emergency Radio Service applicants who have been the unknowing "victims" of the failure of other coordinators to respond timely to interservice sharing requests.

Over and above the delay, we continue to receive responses from or directions to deal "directly with the regional coordinator" of these other coordinating committees. This is doubly frustrating, as I am sure you can appreciate.

We have discussed at length these concerns with the other coordinating committees. In fairness, the problem appears to be that of willing spirits but uncooperative bodies. Unfortunately, the persistence of the problems, the growing dissatisfaction and frustration in the user community, and the fact that new coordination procedures have been in effect for over a year warrant Commission attention and action.

A variety of approaches could improve the situation. However, we are convinced that Commission involvement is crucial. One approach is a policy statement which provides that interservice sharing requests and concurrences be provided within twenty to twenty-five days of receipt of a request for coordination or concurrence. Failure to respond within the timeframe would mean that the interservice request does not pose a problem. This could invite the abuse of blanket denials, but at least the coordinator's response could be reviewed and addressed. We believe such a policy statement is well within the letter and intent of the Report and Order in PR Docket 83-737.

Alternatively, a monthly meeting could be convened in Gettysburg or Washington to review the status of all outstanding requests for interservice sharing or concurrence. The meetings would be chaired by a representative of the Private Radio Bureau. These meetings could be discontinued as soon as the pattern of delay ends.

We have received too many complaints from users and discussed the matter too often with the other coordinators and have not seen any signs of improvement. We feel the integrity



## Fire Radio Service Frequency Coordination

P.O. Box 1513  
Providence, RI 02901  
Tel. (401) 738-2220



International Municipal Signal Association

International Association of Fire Chiefs

of the coordination process is at stake and, because of our commitment to the Commission's goals, we do not want to jeopardize the process.

I look forward to hearing from you.

Very truly yours,

Alfred J. Mello

Enclosure

JANUARY 31, 1988  
 PARTIAL LIST OF OUTSTANDING REQUESTS  
 FOR INTERSERVICE COORDINATION

Applicant	Interservice Action Requested	Other Coordinator	Date Directed to Other Coordinator <sup>1/</sup>	Response
Hillsville Volunteer Fire Dept.	\$90.176	APCO	9-2-87	Pending
City of Alpena	\$90.176	APCO	9-2-87	Pending
Columbus Fire Dept.	\$90.176	AASHTO	9-18-87	Pending
Brentwood Legion Ambulance	UHF Offset	AASHTO	10-1-87	Pending
Sunflower County Rescue	\$90.176	APCO	10-20-87	Pending
Johnson County Fire Service	\$90.21(c)(7) <sup>2/</sup>	AASHTO	10-2-87	Pending
Ronkonhoma Fire Dept.	UHF Offset	AASHTO	7-13-87	Pending

<sup>1/</sup> The 20-day period would begin to run 3-4 days later upon receipt in mail.

Applicant	Interservice Action Requested	Other Coordinator	Date Directed to Other Coordinator	Response
Boston Fire Dept.	90.21(c) (7) <sup>2/</sup>	APCO	5/8/87	Granted 1-7-88
Boro of Middleton Fire Service	\$90.21(c) (7)	APCO	5-2-87	Pending
Rhea County	\$90.176	AASHTO	11/13/87	Denied <sup>3/</sup> 1/12/88

<sup>2/</sup> Interservice concurrence on shared assignment.

<sup>3/</sup> Response received from AASHTO's "coordinator" for State of Georgia.

Fire Radio Service Response  
Times to Requests for  
Interservice Coordination

Applicant	Interservice Coordination Action	Date Received By IMSA/IAFC	Date Certified By IMSA/IAFC
City of Monmouth, Ill., P.D.	VHF adjacent channel	2-4-88	2-8-88
State of Illinois	UHF co-channel	2-4-88	2-8-88
City of Mt. Gilead, Ohio	UHF co-channel	2-4-88	2-8-88
Boro of Marysville, Pennsylvania	UHF offset co-channel	2-3-88	2-7-88
County of Polk, Florida	VHF adjacent channel	2-2-88	2-5-88
City of San Angelo, Texas	VHF adjacent channel	2-2-88	2-7-88
City of Le Claire, Iowa	UHF co-channel	2-4-88	2-8-88
State of Oregon	UHF offset co-channel	2-4-88	2-8-88
FSH Water Commission of Smithton, Illinois	UHF offset co-channel	2-1-88	2-5-88
City of Tyler, Texas	VHF adjacent channel	2-2-88	2-8-88