

# Associated Public-Safety Communications Officers, Inc.

It's a privilege to be an APCO

PRESIDENT  
FRANK J. DEVINE  
NEW YORK POLICE DEPT.  
58-05 52ND AVENUE  
WOODSIDE, NEW YORK 11377

PRESIDENT - ELECT  
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HUNTERDON CTY. COMMUNICATIONS SYST.  
ADMINISTRATION BUILDING, MAIN STREET  
FLEMINGTON, NEW JERSEY 08822

FIRST VICE - PRESIDENT  
JERRY CAMPBELL  
COUNTY COMMUNICATIONS DEPT.  
104 WEST 4TH STREET  
SAN BERNARDINO, CALIFORNIA 92415

J. RHETT McWILLIAMS, Executive Secretary

NEW SMYRNA BEACH, FLORIDA 32069

DDA 427-3462  
904/427-3462  
904/428-8700

SECOND VICE - PRESIDENT  
NATHAN D. McCLURE, III  
WINNEBAGO COUNTY CIVIL DEFENSE  
COURTHOUSE, 402 W. STATE STREET  
ROCKFORD, ILLINOIS 61101

1976 NATIONAL CONFERENCE CHAIRMAN  
LT. N. S. MISSAILIDIS  
N.Y.P.D. COMMUNICATIONS DIVISION  
1 POLICE PLAZA  
NEW YORK, NEW YORK 10038

1977 NATIONAL CONFERENCE CHAIRMAN  
WILLIAM L. MILLER  
POLICE DEPARTMENT  
1121 S. STATE STREET  
CHICAGO, ILLINOIS 60605

September 23, 1975

TO: Chairman, Public Safety Communications Council  
FROM: The Executive Secretary, APCO  
SUBJECT: Reference Request for WARC Inventory Information

Regarding the request for an inventory of land mobile equipment now in the field, I submit the following:

- 1) Despite the stated inaccuracy of the FCC data file, it was submitted by applicants, and it can only be accurately corrected by the same means, since,
- 2) The organizations forming the PSCC, combined, would not have in their membership files a one-on-one ratio of licensees now in the FCC data bank, and even if so,
- 3) APCO and ISMA both have members licensed in the Local Government and Fire Radio Services. The ensuing required reconciliation of responses would present an almost hopeless problem. In addition,
- 4) A mail survey would not be complete, since there is no means of requiring those polled to respond. In fact,
- 5) There is no means whereby an FCC poll could require a response, until such time as the licenses are to be renewed provided such a requirement was added to the license renewal rules.

We can, of course, make a poll that would give us sample information, but it would not be any more adequate than what the FCC now has in its files.

In summary, if the FCC is concerned about the inaccuracy of its data bank, it should obtain actual update information by means of Service polls rather than Association polls. It cannot rely upon the veracity of its own polled information unless there is a lever which insures 100% response. Neither can the costing information be relied upon from this source. First, there would have to be a clear definition of what each class of equipment consisted of. Then, the costing should be done by the suppliers, or the EIA. Otherwise, there will be more guessing at the user level than at the supply level.

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Therefore, if a challenge exists, regarding the accuracy of the FCC data, I submit the proposed method of obtaining "better" information would be even more open to question. Since the FCC data has long been used for projections, etc., a change would significantly amend its next future outlooks.

In the end, it would seem that the so-called "inflated" FCC information would be the better choice. Perhaps a sample poll, indicating some percentage by which the FCC data might be amended, would be useful, but perhaps more dangerous than beneficial.

The FCC should speedily return to "actuals" in its application processing. This will cause the users more trouble each time they make system changes. But, the veracity of the FCC data file is so important a matter in so many areas of effort that it would seem that all else should be secondary.

In view of the fact that the proposed action raises association policy questions, I will not be in a position to comply with your request until the Board gives me direction in this matter. The Board meets during the week of October 5, 1975. I will respond further to your request directly thereafter.

While this does not enhance the probability of meeting your deadlines, I do not consider this of major consequence, since there is no way I could have met them should I have taken immediate action, by means of a procedure that is at this writing not yet clear.

cc: Board of Officers  
Counsel

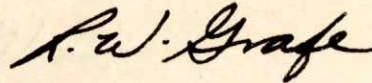
**PUBLIC SAFETY COMMUNICATIONS COUNCIL**

ROBERT W. GRAFE, CHAIRMAN - PSCC 1975  
FLORIDA DEPARTMENT OF TRANSPORTATION  
HAYDON BURNS BUILDING  
TALLAHASSEE, FLORIDA 32304  
TELEPHONE (904) 488-4562

DATE: September 16, 1975

TO: Representatives of Public Safety Communications Council

FROM: Robert W. Grafe, Chairman, P.S.C.C. 1975



COPIES TO: Mr. Neal Pike, Chairman, Private Land Mobile Advisory Committee (WARC-79)  
Mr. Don Walker, Chairman, Fact Finding Body #1

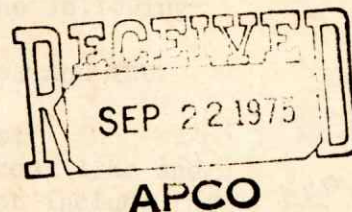
SUBJECT: LETTER OF TRANSMITTAL LETTER COVERING  
REQUEST FOR INFORMATION - RADIO FREQUENCY UTILIZATION, ETC.

Attached to this letter is the request for information of the actual utilization of the equipment, replacement costs and justification statements.

Approximately four (4) persons within each association covering the respective Radio Service will be receiving this letter. AASHTO will represent the Highway Maintenance Radio Service, APCO will represent the Police and Local Government Radio Service, FCCA will represent the Forestry-Conservation Radio Service and IMSA will represent the Fire Radio Service. The four (4) persons within each association should collaborate and only one reply should be rendered from each association. It is immaterial to me who completes the questionnaire only PLEASE complete the questionnaire and let me have your reply as soon as possible but no later than October 6, 1975.

Your earliest attention to this matter will be appreciated.

RWG:jll  
Attachment



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TO: Representatives of Public Safety Communications Council

FROM: Robert W. Grafe, Chairman - P.S.C.C. 1975 *R.W.G.*

COPIES TO: Mr. Neal Pike, Chairman, Private Land Mobile Advisory Committee (WARC-79)  
Mr. Don Walker, Chairman, Fact Finding Body #1

SUBJECT: URGENTLY NEEDED INFORMATION REGARDING  
PUBLIC SAFETY RADIO SERVICE EQUIPMENT FOR WORLD ADMINISTRATIVE RADIO  
COUNCIL, LAND MOBILE WORKING GROUP - TASK FORCE 1

On September 9 & 10, 1975, the Land Mobile Working Group, Task Force 1 met and certain information is urgently needed from each association that will stand "cross-examination" by adversaries in order to retain existing U.S. Land Mobile Service Radio frequencies. The FCC does have base and mobile equipment licensed, however, the information available includes an inflated amount of mobile units. There is an URGENT need for the ACTUAL number of mobile units in use in the Public Safety Radio Services in September 1975. The need exists also for the ACTUAL number of "Land Mobile" stations actually in service under a blanket authorization. Please submit a count of the actual number of all Base Stations and Mobile Units in operation. A ratio of Mobiles and Bases must be accurately established for each Service.

Next, there is a need to obtain the average replacement cost for mobiles and base stations. We must know the investment of all Radio equipment in the Public Safety Radio Services. (For your information, this data gathering will be conducted by others in all Land Mobile Radio Services.)

As a matter of fact a subsequent questionnaire will be forthcoming by others. I am addressing this question in order to apprise you of that need so it is NOT necessary to include this information at this time unless it is readily available. We do want you to answer the next questionnaire whether or not you have answered it at this time.

A criterion established at the meeting included the following:

- Mobiles - the radio unit, the accessories and the installation costs;
- Portables - radio unit and its accessories;
- Base Station - the radio unit, the antenna, coax line and all installation costs - do not include the tower costs as there may be an additional study in this area.



Representatives of P.S.C.C.  
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The U.S.A. position will be enhanced if every Service would supply very complete and accurate up-dated detailed justification of radio frequencies in use. Therefore, in view of foregoing information in this paragraph, please supply a very detailed statement of justification for the frequencies in use today and for the twenty-five years ahead that I will address in the next paragraph.

There is now a need for justification of projected needs for the next twenty-five years. Please advise spectrum needs for the year 2000 as best each Service foresees the future. There may be some exotic needs we do not foresee; however, do the best you can in this difficult endeavor.

In summary and to briefly recap the needs expressed in this request, the four (4) major basic questions are as follows:

- ✓ 1 - The ACTUAL number of Mobile Units and Base Stations in operation. (Not the inflated number authorized.)
- ✓ 2 - The average replacement cost for mobiles, land mobiles, portables and base stations including installation.
- ✓ 3 - A strong justification statement for the use of the existing frequencies.
- ✓ 4 - A justification statement for the projected need of spectrum and/or utilization in the year 2000.

Prior to mailing this request, I read it to Mr. Neal Pike, Chairman, Private Land Mobile Advisory Committee (WARC-79). Mr. Pike advised that I inform each of you, "that in no way will any variance from the licensee's authorization, place the license in jeopardy." Therefore, PLEASE be absolutely accurate in the data submitted, irregardless of that which appears on the authorization.

This information is necessary for the Committees' use prior to October 10, 1975. In view of this, may I respectfully request this information be in my office no later than Monday, October 6, 1975. This information is needed for the October 10, 1975, meeting; however, in the event it is impossible to have it by that time PLEASE have it in my hands as soon thereafter as possible. There most likely will be a November meeting and we MUST have it at that time. Please do not ignore this request feeling it is impossible to accomplish - it would be preferable to accept it late rather than not receive it at all.

Thank you for your earliest attention to this urgent matter.

RWG:j11