

**Before the  
Federal Communications Commission  
Washington, DC 20554**

In the Matter of )  
 )  
Washington County Consolidated ) File No. 0007375570  
Communications Agency Application and )  
Request for Waiver Regarding Two 800 MHz )  
B/ILT Pool Channels )

**REPLY COMMENTS OF APCO INTERNATIONAL**

The Association of Public-Safety Communications Officials-International, Inc. (APCO) hereby submits the following reply comments in response to the Commission’s Public Notice in the above-captioned proceeding.<sup>1</sup>

Founded in 1935, APCO is the nation’s oldest and largest organization of public safety communications professionals. APCO is a non-profit association with over 27,000 members, primarily consisting of state and local government employees who manage and operate public safety communications systems—including 9-1-1 Public Safety Answering Points (PSAPs), emergency operations centers, radio networks, and information technology—for law enforcement, fire, emergency medical, and other public safety agencies.

The Washington County Consolidated Communications Agency, in Washington County, Oregon, seeks to add six new 800 MHz channels to its base station located on Gales Peak in order to upgrade its radio system, and has requested a waiver of Commission rules so that it can

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<sup>1</sup> Public Safety and Homeland Security Bureau Seeks Comment on Application and Waiver Request Filed by Washington County Consolidated Communications Agency to License Two 800 MHz Business/Industrial/Land Transportation Pool Channels, File No. 0007375570, *Public Notice*, DA 17-513 (Public Safety and Homeland Security Bur. rel. May 25, 2017) (“Notice”).

license two channels from the Business/Industrial/Land Transportation (B/ILT) Pool.<sup>2</sup> APCO advised Washington County on options for available channels.<sup>3</sup>

APCO first responds to matters raised in the record regarding alternatives to licensing two channels from the B/ILT Pool. In its Comments, the Enterprise Wireless Alliance (EWA) suggests that Washington County either use available 12.5 kHz NPSPAC channels or use two General Category (GC) channels, 854.2375 MHz and 854.6125 MHz, in lieu of the B/ILT channels requested.<sup>4</sup> APCO stands by its original recommendations. As APCO advised, a “search for available channels for the Gales Peak site revealed no additional public safety or vacated spectrum frequencies that can be assigned due to ‘vacated spectrum not being released yet, incumbents being less than 88 km away or short spacing issues, or a combination of the above,’” and that “additional B/ILT Pool channels will remain available for licensing in the area surrounding the Gales Peak site even if Washington County receives the B/ILT channels listed on its application.”<sup>5</sup> Accordingly, APCO agrees with the Reply Comments of Washington County that no other NPSPAC channels would be available that meet public safety interference criteria, and that any potential Sprint-vacated GC channels may require a waiver for early access to vacated spectrum that the Commission is not ordinarily inclined to grant.

APCO next addresses the unrelated matters raised by EWA in its Comments. EWA discusses issues that are irrelevant to and outside the scope of this narrow proceeding. The Notice specifically seeks comment “on whether the Bureau should grant Washington County a waiver of the freeze on inter-category sharing to allow licensing of the two B/ILT Pool channels at its Gales Peak site,” and “from any party that would be affected by Washington County’s

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<sup>2</sup> *Id.* at 1.

<sup>3</sup> *Id.* at 2.

<sup>4</sup> Comments of the Enterprise Wireless Alliance, File No. 0007375570, at 6-7 (filed Jun. 9, 2017).

<sup>5</sup> Notice at 2.

proposal to operate B/ILT Pool frequencies 854.7625 MHz and 855.8125 MHz at Gales Peak and B/ILT Pool frequencies 809.7625 MHz and 810.8125 MHz for associated mobile units operating within 32 kilometers of the Gales Peak site.”<sup>6</sup>

Instead of confining its Comments to Washington County’s request, EWA attempts to use this proceeding to air general and unsubstantiated complaints about Private Land Mobile Radio spectrum policies and unrelated waiver request proceedings.<sup>7</sup> For example, EWA raises a separate waiver request filed by American Electric Power Service Corporation (AEP) and the Reply Comments that APCO filed in that proceeding.<sup>8</sup> Not only is AEP’s request entirely irrelevant to the matter at hand, EWA’s desire to address general complaints and unrelated proceedings taxes the limited resources of the Commission and public safety.

Respectfully submitted,

APCO INTERNATIONAL

By: /s/

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<sup>6</sup> *Id.* at 3.

<sup>7</sup> Comments of the Enterprise Wireless Alliance, at 3-5, 7-9.

<sup>8</sup> *Id.* at 7-8.

**CERTIFICATE OF SERVICE**

I, Nicole M. Zimbelman, government relations counsel at the Association of Public-Safety Communications Officials-International, Inc., hereby state that true copies of the foregoing REPLY COMMENTS were sent by U.S. Mail, June 23, 2017, to the attached Service List.

/s/

Nicole M. Zimbelman

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