



**DEPARTMENT OF INFORMATION TECHNOLOGY
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GINO MENCHINI
Commissioner

Agostino Cangemi
*Deputy Commissioner and
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August 7, 2002

BY ELECTRONIC FILING

Federal Communications Commission
445 12th Street SW
Washington, DC 20554

**Reference: Notice of Proposed Rulemaking (WT-02-55) – Improving Public Safety
Communications in the 800 MHz Band**

On June 27, 2002, the Federal Communications Commission (“Commission”) extended by thirty days, to August 7, 2002, the due date for reply comments in the above referenced proceeding. The extension was granted in response to a petition submitted jointly by certain public safety and private entities, which requested additional time “to complete and submit a compromise proposal.”¹

The City of New York (“City”) intends to submit *ex parte* reply comments to the Commission following our review of such proposal. The City has been in contact with, and has received periodic updates on the proposal from the Association of Public Safety Communications Officials-International, Inc. (“APCO”). APCO has been both responsive to the City’s inquiries, and considerate of our concerns. Nonetheless, the City has not yet had an opportunity to view the joint proposal in its final form.

As stated in our initial comments to the Commission, and in our discussions with APCO, the City’s position is firm: an acceptable plan must specifically identify external funding sources to cover the full costs of any proposed public safety relocation, and must ensure that public safety systems remain 100% operational during any transition period.

Sincerely,

/s/Agostino Cangemi
Agostino Cangemi

¹ See *Request for Extension of Time*, submitted by the Association of Public Safety Communications Officials-International, Inc., the International Association of Fire Chiefs, Inc., the International Association of Chiefs of Police, et. al., Jun. 25, 2002.