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February 26, 1992

FEB 26 1992

Federal Communications Commission  
Office of the Secretary

Ms. Donna R. Searcy  
Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, DC 20554

Ex Parte

RE: ET Docket No. 92-9

Dear Ms. Searcy:

This morning I participated in a videotaped panel discussion produced by KMB Associates, Inc. Present on that panel with me was Dr. Thomas Stanley, the Federal Communications Commission's (FCC's) Chief Engineer. In response to statements made by Dr. Stanley concerning the reasons the Commission was advancing its proposals in this docket to reallocate the 1.85-2.2 GHz (2 GHz) band to "emerging technology," I provided a rebuttal outlining UTC's position which, essentially, included:

- o That the FCC should have looked at other bands for emerging technology which were less loaded with licensees than the 2 GHz band; and, specifically I mentioned the 2500-2690 MHz band.
- o That before the FCC should proceed with this docket, it should first make sure that there was adequate replacement spectrum for displaced 2 GHz licensees. I specifically urged that the FCC should promptly initiate negotiations with 2 GHz user groups, like UTC, and NTIA on the use of the 1710-1850 MHz band as replacement spectrum. I also urged the FCC to go forward with the necessary actions to make the other bands suggested as replacement spectrum (e.g., common carrier 4 and 6 GHz) usable for 2 GHz operations, particularly by narrowband 2 GHz users.
- o I urged that all existing 2 GHz users should be allowed to continue, indefinitely, to operate in this band on a co-equal primary basis with new technology users.

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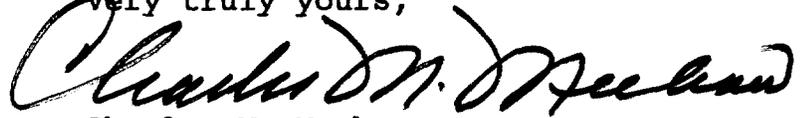
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- o I urged that the FCC should adopt a procedure whereby new technology users which cause a displacement of existing 2 GHz users should be required to bear the full cost of relocation.

I am providing two copies of this letter and request that they be placed in the ET Docket No. 92-9 files.

Should any questions arise concerning this transmittal, please let me know.

Very truly yours,



Charles M. Meehan  
Executive Director

CMM/nrt

cc: Dr. Thomas Stanley