

Docket 5
222

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

ORIGINAL
FILE

EX PARTE OR LATE FILED

19 FEB 1992

IN REPLY REFER TO:

CN9200337

92-9 /

RECEIVED

FEB 24 1992

Federal Communications Commission
Office of the Secretary

Honorable John C. Danforth
United States Senate
249 Russell Senate Office Building
Washington, DC 20510-2502

Dear Senator Danforth:

Your letter to Mrs. Linda Townsend Solheim, Director of Legislative Affairs, has been referred to me for reply. Your constituents expressed concern to you regarding proposals to reallocate frequencies at 2 GHz that would impact the Rural Electric Cooperatives.

On January 16, 1992, the Commission adopted a Notice of Proposed Rule Making (Notice) in ET Docket No. 92-9 that proposes allocating 220 MHz of 2 GHz spectrum for use by providers of emerging technologies. With regard to licensees currently using portions of this spectrum, the Commission proposed to permit state and local government licensees, including public safety agencies, to continue indefinitely their current operations on a primary basis. Other users would be permitted to continue their current operations on a primary basis for a period of time to be established - such as 10 or 15 years. Subsequently, they would be permitted to continue operating only on a secondary basis. Expansion and new microwave systems would be permitted on a primary basis only at higher frequencies. In conjunction with the Notice, the Commission released a staff study of existing use of this spectrum and identified other suitable frequencies available for this purpose. To further facilitate accommodation of the competing demands for this spectrum, the Commission also proposed to permit negotiation of financial arrangements between existing licensees and parties proposing new services. Such an approach would facilitate access to this spectrum for services employing emerging technologies.

These provisions are intended to prevent disruption to the communications of the existing licensees, yet still provide the spectrum needed by U.S. companies to develop new and innovative telecommunications products and services and bolster U.S. competitiveness in world telecommunications markets. An example of one such new proposed service is the personal communications service (PCS), which the Commission is addressing concurrently in GEN Docket No. 90-314.

Honorable John C. Danforth

2.

The needs of the existing 2 GHz users are of importance to the Commission, and are being taken carefully into consideration. Please be assured that your constituents' concerns will be taken into account before a final determination is made, and for that purpose, I am making there letters part of the record in the two dockets discussed above, ET Docket No. 92-9 and GEN Docket No. 90-314.

Sincerely,

A handwritten signature in cursive script that reads "Thomas P. Stanley". The signature is written in black ink and is positioned above the typed name and title.

Thomas P. Stanley
Chief Engineer

ERNEST F. HOLLINGS, SOUTH CAROLINA, CHAIRMAN

DANIEL K. INOUE, HAWAII
WENDELL H. FORD, KENTUCKY
J. JAMES EXON, NEBRASKA
AL GORE, TENNESSEE
D. ROCKEFELLER IV, WEST VIRGINIA
BENTSEN, TEXAS
F. KERRY, MASSACHUSETTS
JOHN B. BREAUX, LOUISIANA
RICHARD H. BRYAN, NEVADA
CHARLES S. ROBB, VIRGINIA

JOHN C. DANFORTH, MISSOURI
BOB PACKWOOD, OREGON
LARRY PRESSLER, SOUTH DAKOTA
TED STEVENS, ALASKA
ROBERT W. KASTEN, JR., WISCONSIN
JOHN MCCAIN, ARIZONA
CONRAD BURNS, MONTANA
SLADE GORTON, WASHINGTON
TRENT LOTT, MISSISSIPPI

KEVIN G. CURTIN, CHIEF COUNSEL AND STAFF DIRECTOR
WALTER B. McCORMICK, JR., MINORITY CHIEF COUNSEL AND STAFF DIRECTOR

United States Senate

COMMITTEE ON COMMERCE, SCIENCE,
AND TRANSPORTATION

WASHINGTON, DC 20510-6125

DET
90-314

January 29, 1992

Ms. Linda Solheim
Director
Legislative Affairs
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RECEIVED

FEB 04 1992

LEGISLATIVE AFFAIRS
OCPA

Dear Ms. Solheim:

Enclosed are copies of letters that were sent to me by several of my constituents who are concerned about keeping the Rural Electric Cooperatives' frequency band of 1.8 to 2.2 G.H.Z. at its current place.

I would appreciate receiving information on this matter at your earliest convenience.

Thank you for your assistance.

Sincerely,



John C. Danforth

Enclosures (15)

1/31

JAN 9 12:34
January 9, 1992

PRIORITY

Richard Leimkuehler
R. R. 3
Brunswick, Missouri, 65236

Honorable John Danforth
United States Senate
249 Russell Building
Washington D.C. 20510

Com

Dear Senator Danforth:

I would appreciate you writing to Mr. Al Sikes, Chairman of the Federal Communications Commission, a request allowing the Rural Electric Systems, to keep the frequencies they now have. It is vital to the Rural Electrics to be able to keep the frequency band they now have of 1.8 to 2.2 G.H.Z. for communication in case of storms and severe outages. If they would have to change to a frequency band other than 1.8 to 2.2 G.H.Z. it would cost the Rural Electrics \$8 Million in Missouri alone, plus severe service problems.

We would appreciate your support on the proposed Amendment S. 218 the Emerging Telecommunications Technologies Act of 1991.

Yours truly,



Richard Leimkuehler - President
Farmers Electric Coopertive
Chillicothe, Missouri

2-024-60-2009



**Cuivre River Electric
Cooperative, Inc.**

1112 E. Cherry St., P. O. Box 160
Troy, MO 63379
Telephone: (314) 528-8261

1/31

PRIORITY

January 13, 1992

Honorable John Danforth
United States Senate
249 Russell Building
Washington, D.C. 20510

Comm

Dear Senator Danforth:

It is of great concern to our electric cooperative that there exists the possibility of us losing the low frequency microwave band. I'm sure you are aware of the extreme costs involved in moving to a higher band. The estimated cost given to us by our statewide office is in the vicinity of \$8 million dollars for the Missouri electric cooperatives. Needless to say, our rural members are not in the position to pay any higher electric rates.

It is requested of you to discuss this serious matter with the chairman of the Federal Communication Commission, Mr. Al Sikes. We urge you to express our concern to him and encourage him to allow us to retain our frequency band for the benefit of all rural Missouri citizens.

Your prompt attention to this matter will be appreciated.

Sincerely,

Dan L. Brown

Dan L. Brown
General Manager/CEO

DLB/ml

2-024-600-2010



**Central Electric
Power Cooperative**

2106 Jefferson Street, P.O. Box 269
Jefferson City, Missouri 65102
Telephone: (314) 634-2454
Fax: (314) 634-3892

JAN 12 PM 10:16

COMMERCE COMMITTEE
1992 JAN 22 PM 2:15

1/31

January 9, 1992

The Honorable John C. Danforth
United States Senate
249 Russell Senate Office Building
Washington, D.C. 20510

Com

Dear Senator Danforth:

In early December, you wrote Chairman Sikes of the Federal Communications Commission and related concerns of the rural electric cooperatives and others regarding the proposed allocation of the 1.8-2.2 gigahertz band for the development of personal communication services. Central Electric Power Cooperative is one of those potentially affected utilities, providing wholesale electric service to eight distribution systems which serve over 110,000 electric consumers in 26 counties of Central Missouri. In providing such service, Central makes extensive use of the 1.8-2.2 gigahertz band.

The preliminary cost estimate of moving to an alternative band is estimated at many millions of dollars in Missouri alone. To ask rural electric consumers to make such an additional investment for the purposes of developing personal communication services principally in major metropolitan areas seems unfair at best. More important, I believe, is the issue of reliability of electric service.

Central, along with other electric cooperatives and segments of the electric utility industry provide an essential service to the public. Just how essential that service is was again demonstrated the other day during the rush hour outage in Washington, D.C. If the providers of such an essential service are required to give up mature and thoroughly tested communication systems in the 1.8-2.2 gigahertz band and utilize unfamiliar bands and/or less proven technologies, reliability of electric service can and will suffer.

2-024-600-2016

The Honorable John C. Danforth
January 9, 1992
Page 2

Because of these concerns, I am requesting that you ask Mr. Sikes specifically to allow electric utilities and other providers of essential services be allowed to keep their present allocation in the 1.8-2.2 gigahertz band. If this is not possible, I request that you offer an amendment to S218, "The Emerging Telecommunications Technologies Act of 1991," that would allow "shared use" of this band, similar to the following:

At the end of Section 4, add the following new subsection:

(f) Shared Use - the frequencies assigned to an entity that provides electric service to the public shall not be withdrawn, but may be eligible for shared use, provided that such shared use shall not cause harmful interference to the affected provider of electric service or adversely affect the reliability of its power system.

Thank you for your help in this very essential matter.

Yours truly,

CENTRAL ELECTRIC POWER COOPERATIVE


Julian J. Brix
General Manager

JJB:jds

Atchison-Holt Electric Cooperative



1992 JAN 22 PM 2:00
COMMERCE COMMITTEE
P.O. Box 1000 Phone No. 744-5344

Rock Port, Missouri 64482

January 10, 1992

1/31

The Honorable John Danforth
United States Senate
249 Russell Senate Office Building
Washington, D. C. 20510

Dear Senator Danforth:

I am writing in regard to the possibility of the electric cooperatives of the State of Missouri being moved off of our present microwave frequency band of 1.8 to 2.2 GHz which would result in an \$8 million dollar cost to the cooperatives to move to another frequency.

It would be greatly appreciated if you would ask Al Sikes, Chairman of the Federal Communications Commission, to allow us to keep the frequencies that are presently allocated to us. If this is not possible, we would ask that he offer an amendment that would allow "shared use" of the frequencies assigned to our rural electrics.

Our microwave system is extremely important to our operations, especially during emergency storm situations and it is vital in our ability to provide reliable, quality electric service to our members.

Any assistance you could give us in this matter would be greatly appreciated.

Sincerely,

ATCHISON-HOLT ELECTRIC COOPERATIVE

Ron Hunter

Ron Hunter, Manager

RH/gd

2-024-60-2015



Co-Mo Electric Cooperative, Inc.

Highway 5 South, P.O. Box 220
Tipton, MO 65081
Telephone: (816) 433-5521

1/31
COMMERCE COMMITTEE
1992 JAN 22 PM 2:15

January 9, 1992

Honorable John Danforth
United States Senate
249 Russell Senate Office Building
Washington, D.C. 20510

Dear Senator Danforth:

The micro-wave frequency band of 1.8 to 2.2 GHz is utilized by, and very important to, the rural electric cooperatives in Missouri. We would very much appreciate your request to FCC Chairman Al Sikes that we be allowed to continue utilizing these frequencies which have been allocated to us.

An amendment, allowing shared use of these frequencies, to S. 218 would be the most acceptable alternative.

This is a vitally important issue to us. Moving off this frequency band would generate a cost of \$8-million just in Missouri. This would certainly have an impact on the rates our members pay for electric service.

Thanks for your support on this and past issues of importance to outstate Missouri.

Very truly yours,

Vernon Gage, Manager

2-024-60-2014

1/31



Southwest Electric Cooperative

1992 DANFORTH 265613 PM 2:16
P.O. BOX 150 • BOLIVAR, MO 64603
AREA CODE (417) 326-5244

Jerry Divin
General Manager

January 14, 1992

Honorable John Danforth
United States Senate
249 Russell Building
Washington, D.C. 20510

Dear Sen. Danforth:

One of the trademark characteristics of rural electric cooperatives is reliability. At Southwest Electric Cooperative, we've served our members since 1939 with a constant goal of providing reliable service at the best possible cost. Part of our service reliability depends on our use of the 1.8 to 2.2 Gigahertz(ghz) frequency band which is now in jeopardy.

Rural electric cooperative members all across the state would bear the estimated cost of \$8 million to move the cooperatives off the 1.8-2.2 ghz band. Additional costs would be paid by others including the Union Pacific Railroad which is also a viable force in the Missouri economy.

These additional costs would ultimately be paid by Missouri's rural consumers, a population that already faces tough economic times. On behalf of Southwest Electric's membership, I ask that you ask Federal Communications Commission Chairman Al Sikes to allow us to keep the frequencies allocated to us. If this is not possible, I ask that you offer an amendment to allow shared use of the frequencies.

Rural electric cooperatives have never been opposed to progress, but we ask now that changes not be made in the name of progress that carry a high price tag for rural Missourians.

Sincerely,

Jerry Divin
General Manager

cc: Frank Stork

2-024-600-2013



BARRY ELECTRIC COOPERATIVE



1131

100 South Main — P. O. Box 307

CASSVILLE, MISSOURI 65625

PHONE 816-2131
68 COMMUNICATIONS COMMITTEE

1992 JAN 22 PM 2:15
January 14, 1992

Honorable John Danforth
United States Senate
249 Russell Building
Washington, D.C. 20510

Dear Senator Danforth,

I am contacting you in reference to a decision facing the Federal Communications Commission in the next few months about the allocation of spectrum for the development of Personal Communication Services (PCS) in the United States. It is my understanding that the commission, on a preliminary basis, has determined that the spectrum to be allocated should come from the 1.8 to 2.2 Ghz band.

The Rural Electric Cooperatives of Missouri and Oklahoma have made a major investment in an extensive microwave system which employs the 2 Ghz Frequency Spectrum. I am told by our communications people that this is a very reliable band and that it is well suited for utility telecommunications needs. Barry Electric Cooperative is very concerned that if Rural Electric Cooperatives are required to vacate the 1.8 to 2.2 Ghz band, the reliability of electric service could suffer, and consumers would be faced with higher electricity costs to pay for the replacement of existing microwave facilities. I am told that in Missouri alone the cost of us moving off the frequency band of 1.8 to 2.2 Ghz would be eight million dollars.

Senator Danforth, I am asking that you contact Al Sikes, Chairman of the Federal Communications Commission, and ask him to allow the Rural Electric Cooperatives to

2-024-60-2012

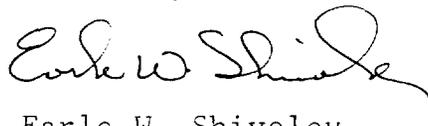
keep the frequencies allocated to them. If he can't do that, we ask that he offer an amendment that would allow "Shared Use" of the frequencies assigned to our Rural Electric Systems. Below is a copy of the amendment we would like to have attached to S.218, the "Emerging Telecommunications Technologies Act of 1991".

Proposed Amendment to S.218:

"Emerging Telecommunications Technologies Act of 1991"
At the end of Section 4, add the following new subsection:
(f) Share Use... The frequencies assigned to an entity that provided electric service to the public shall not be withdrawn, but may be eligible for shared use, provided that such shared use shall not cause harmful interference to the affected provider of electric service or adversely affect the reliability of its power system.

Thank you for your time and effort in helping resolve this problem.

Sincerely,



Earle W. Shiveley
General Manager

gtw/ES

1/31

N.W.
1992 JAN 10 PM 10:33



1992 JAN 22 PM 2:16

Electric Power Cooperative, Inc.

P.O. Box 312; Cameron, Missouri 64429
(816)-632-2121

January 10, 1992

The Honorable John Danforth
United States Senate
249 Russell Building
Washington, D.C. 20510

PRIORITY
MSD
Commerce

Dear Senator Danforth:

At a time when the financial squeeze is on rural cooperatives as a result of mandated measures through the Clean Air Act on the one side and on declining rural populations on the other, we can ill afford another unnecessary \$8 million hit. I would ask that you redouble your efforts to convince Al Sikes, Chairman of the Federal Communications Commission, to allow the cooperatives to keep the frequency band allocated to us.

My understanding is that the Commission is leaning toward a change in the spectrum. This decision would require the existing users to move. The cost of us moving off the frequency band of 1.8 to 2.2 GHz would be \$8 million just in Missouri.

If the FCC will not allow us to keep the frequency we have been using, we would ask that you offer an amendment that would allow "shared use" of the frequencies assigned to our rural electric systems. The proposed shared use amendment to S.218 would come at the end of Section 4. This sub-section has been suggested:

(f) Shared Use -- The frequencies assigned to an entity that provides electric service to the public shall not be withdrawn, but may be eligible for shared use, provided that such shared use shall not cause harmful interference to the affected provider of electric service or adversely affect the reliability of its power system."

Thank you for your support in the past. We will continue to need your help in the future.

Sincerely,

N.W. ELECTRIC POWER COOPERATIVE, INC.

Richard L. Arnold, General Manager

2-024-60-2811

Boone Electric COOPERATIVE



TELEPHONE: A. C. 314/449-4181 • 1413 RANGE LINE • P. O. BOX 797

January 9, 1992

COLUMBIA, MISSOURI 65205-0797

The Honorable John Danforth
United States Senate
249 Russell Building
Washington, D. C. 20510

REGARDING: Proposed Amendment to S. 218

Dear Senator Danforth,

I am writing in regard to the allocation of frequencies for the development of personal communication services in the United States.

As you know, electric utilities, including RECs, utilize these frequencies (1.8 to 2.2 Ghz band) and have made major investments that enable us to provide reliable electric power to the remote and low density areas that we serve.

We are concerned that if we are required to vacate these frequencies, the reliability of electric service could suffer and our consumers would be faced with higher electric costs to pay for the replacement of our existing facilities.

We urge that you consider the following amendment to S 218.

Proposed Amendment to S. 218
"Emerging Telecommunications Technologies Act of 1991"

At the end of Section 4, add the following new subsection:

(f) Shared Use -- The frequencies assigned to an entity that provides electric service to the public shall not be withdrawn, but may be eligible for shared use, provided that such shared use shall not cause harmful interference to the affected provider of electric service or adversely affect the reliability of its power system.

Thank you for your consideration.

Sincerely,

Robert M. Alderson
General Manager

cc: Frank Stork

2-024-60-2017

42 PM 2:15

11/31



GRUNDY ELECTRIC COOPERATIVE, INC.

4100 OKLAHOMA AVENUE P.O. BOX 189 TRENTON, MO. 64683-359-3941

JAN 13 PM 10:15

January 9, 1992

Honorable John Danforth
United States Senate
249 Russell Building
Washington, D. C. 20510

Dear Senator Danforth:

I am writing to request that you consider asking Al Sikes, chairman of the Federal Communications Commission, to allow us to keep the frequencies allocated to rural electric cooperatives. If that cannot be done, we would like to ask that you offer an amendment that would allow "shared use" of these frequencies.

The cost of our moving off the frequency band of 1.8 to 2.2 GHz would be \$8 million in Missouri alone.

Your assistance in this vitally important issue would be greatly appreciated.

Sincerely,

Jon McClure
Jon McClure
Manager

JM/dm

2-024-60-2018



M & A ELECTRIC POWER COOPERATIVE

Post Office Box 670
Poplar Bluff, Mo. 63901
Telephone [314] 785-9651
Fax [314] 785-9653

January 10, 1992

Honorable John Danforth
United States Senate
249 Russell Building
Washington, D.C. 20510

Re: Frequency Spectrum Allocation

Dear Senator Danforth:

This cooperative presently operates a significant amount of microwave equipment in the 1.8 to 2.2 GHz band. Effective and reliable operation of our power supply system is dependent upon our microwave system. We provide wholesale power supply to four retail distribution cooperatives. They in turn provide electric service to most of the rural areas in eighteen Southeast Missouri counties. Reliable electric service is essential to the consumers we serve.

The proposal by the Federal Communications Commission to reallocate the 1.8 to 2.2 GHz band to other users is of great concern to us. Such an action would cause major disruption to our microwave system and would cost in excess of \$ 500,000. to make necessary modification to that system.

Please ask the Federal Communications Commission to allow us to keep the frequencies allocated to us. If this is not possible then we would ask that an amendment be offered to S.218, "Emerging Telecommunications Technologies Act of 1991" to allow "shared use" of the frequencies presently assigned to us, stated as follows:

At the end of Section 4, add the following new subsection:

(f) Shared Use.--The frequencies assigned to an entity that provides electric service to the public shall not be withdrawn, but may be eligible for shared use, provided that such shared use shall not cause harmful interference to the affected provider of electric service or adversely affect the reliability of its power system."

Thank you for your assistance in this matter.

Sincerely,


Robert E. Stagner
General Manager

mj

1/31

2-024-60-2019



**Farmers' Electric
Cooperative, Inc.**

Old Hwy. 36 East, P.O. Box 680
Chillicothe, Mo. 64601
Telephone: (816) 646-4281

COMMERCE COMMITTEE

1992 JAN 22 PM 2:15

January 9, 1992

1131

JAN 13 10:45

The Honorable John Danforth
United States Senate
249 Russell Building
Washington, DC 20510

Com

Dear Senator Danforth:

Communications for any business is a top priority. In the world of rural electric cooperatives our radio communications and protection of our current frequency band of 1.8 to 2.2 GHz is vital.

I encourage you to follow up with your efforts to encourage Chairman Sikes to allow us to keep those frequencies allocated to us. If he can't do that we would ask that he offer an amendment that would allow "shared use" of the frequencies assigned to our rural electric systems. This proposed amendment would be to S. 218, "Emerging Telecommunications Technologies Act of 1991". I am enclosing a copy of the proposed amendment.

This issue, if not resolved, would cost the rural electric systems, in Missouri alone, about \$8 million.

We appreciate your continued help.

Sincerely,

Dan Bryan
General Manager

DB/jt
Enclosure

2-024-60-2020

Proposed Amendment to S. 218,
"Emerging Telecommunications Technologies Act of 1991"

Shared Use.--The frequencies assigned to an entity that provides electric service to the public shall not be withdrawn, but may be eligible for shared use, provided that such shared use shall not cause harmful interference to the affected provider of electric service or adversely affect the reliability of its power system.

113

JAN 13 12:55

COMMERCE COMMITTEE

1992 JAN 22 PM 2:15

REESMAN FOOD EQUIPMENT SERVICE
Div. of REESMAN DAIRY FARMS
ROUTE #4 BOX 135
KIRKSVILLE, MO 63501
PHONE 1-816-665-8400

January 9, 1992

Honorable John Danforth
United States Senate
249 Russell Building
Washington, D.C. 20510

RE: Frequency Spectrum

Clay

Dear Senator Danforth,

I am writing you in regard to keeping the frequencies allocated to "Associated Missouri Electric Cooperatives" (AMEC) or an Amendment that would allow "Shared Use" of the frequencies assigned to the Rural Systems.

The cost to us to move off the frequency band of 1.8 to 2.2 GHZ would be \$8 million, in Missouri.

Please ask Al Stikes, Chairman of the Federal Communications Commission to consider all of the above.

Thank you for your support.

Sincerely yours,

Frank A. Reesman

Frank A. Reesman, AMEC Board member

FAR/jb

cc:Frank Stork

2-024-60-2021

113



January 9, 1992

The Honorable John Danforth
 United States Senate
 249 Russell Building
 Washington, D.C. 20510

[Handwritten signature]
[Handwritten initials]

Dear Senator Danforth:

Northwest Missouri Electric Cooperative is asking your help in requesting Mr. Al Sikes, Chairman of the Federal Communications Commission, to allow us to keep the frequencies that are presently allocated to us. If that isn't possible, an amendment to allow "shared use" would certainly help us. The estimated cost to the Cooperatives in Missouri alone, to move from the band of 1.8 to 2.2 GHz would be in excess of \$8 million.

Thank you for any help you can give us in this matter.

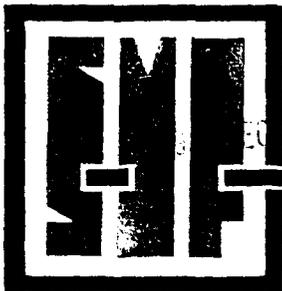
Sincerely,

[Handwritten signature: Howard L. Miller]
 Howard L. Miller
 General Manager

HLM/k11

2-024-60-2022

1/31



SHO-ME POWER CORPORATION

P.O. BOX 105
MARSHFIELD, MISSOURI 65706 (417) 468-2615
FAX (417) 468-2611

COMMERCE COMMITTEE
JAN 22 PM 2:15

JOHN K. DAVIS General Manager

December 2, 1991

The Honorable John C. Danforth
United States Senate
249 Russell Senate Office Building
Washington, D. C. 20510 *Com*

Dear Senator Danforth:

Re: FCC GEN DOCKET NO. 90-314 "Amendment of the
Commission's Rules to Establish New Personal
Communications Services"

Sho-Me Power Corporation wishes to express a grave concern regarding the effort by the Federal Communications Commission (FCC) to reallocate the radio frequency spectrum band between 1850 and 2200 Megahertz (2 GHz) in their current proceedings to establish a new "Personal Communication Service" (PSC) as outlined in FCC GEN Docket 90-314 and the recently released FCC Policy Statement and Order, dated October 25, 1991.

In the Statement and Order, the FCC expressed its intention to allocate frequency spectrum in the 2 GHz band for Personal Communications Networks (PCN) commencing in 1992.

In a related matter, the FCC's Office of Engineering and Technology (OET) is studying the technical feasibility of "clearing" the 2 GHz band of its existing users to create a "reserve" of spectrum for "emerging technologies", e.g., PCN.

The object of these activities is to create an advanced cellular type communications service whereby individuals could have access to the telephone network in the urban areas of United States and several foreign countries via a small portable transceiver operating in the 2 GHz radio frequency band.

2-024-00-720-2

The 2 GHz band is now extensively used in the United States by electric power utilities to provide microwave communications for critical control and monitoring of high voltage power lines, substations and generating stations. Additional supporting functions performed via the microwave include load control, two way mobile radio control, voice communication to field personnel and data interchange.

Other heavy users of the 2 GHz frequency band include the petroleum, railroad, telephone and broadcast industries as well as state and local governments.

Sho-Me Power Corporation is a generation and transmission power company serving roughly 25% of the land area in the south central part of the State of Missouri. Wholesale electric energy is delivered to nine REA distribution cooperatives, seventeen municipally owned electric systems and one major military installation at Fort Leonard Wood, Missouri.

The backbone of our supporting communication network is a 2 GHz microwave system consisting of 28 stations with associated towers, buildings, land, etc. To relocate our system to another frequency band would require an expenditure of approximately \$4,000,000, all of which would eventually be reflected in our customer rate base.

The Utilities Telecommunications Council in Washington, D. C. estimates the cost to relocate the current 2 GHz users in Missouri would approximate \$100,000,000. On a nationwide basis the cost would exceed five billion dollars.

In view of the fact that the PCS program is not really defined, nor has it been established that this service will actually develop in the United States considering the present availability of cellular radio which compares functionally with PCS and with much wider coverage areas, we are fearful the FCC's activity is proceeding toward the establishment of this service without seriously considering the injurious consequences to the crucial utilization by the present users.

Therefore, Sho-Me Power Corporation respectfully urges that those Committees or Subcommittees in the House and the Senate which have oversight responsibility for the Federal Communications Committee conduct a hearing where all the policy issues in this matter can be given a fair hearing. We suggest that these meetings focus on such questions as:

- (a) Is there a proven need to create a PCS system that would have a greater priority than that of existing users of the 2 GHz band?
- (b) Why not select other frequency bands which are less crowded?
- (c) If displacement occurs, has the FCC allocated satisfactory spectrum for the displaced users?
- (d) Would existing users continue to operate on a coequal and primary basis?
- (e) Who will pay for the cost of relocating, the impacted user or those who stand to benefit economically?
- (f) If displaced to a different frequency spectrum, how will reliability and safety be affected?

The possible goal of such a hearing would be for the Congressional Committee involved to direct the FCC to hold up on any further effort to reallocate the 2 GHz band until the FCC has developed answers to the questions raised and has reported back to the Congressional Committee.

We cannot overemphasize the seriousness of this matter and its ramifications to our company, to other utilities in the State of Missouri and to 2 GHz users nationwide. Since PSC is expected to develop, if at all, only in the major urban areas, we feel it is quite a price to pay for the rural area users to suffer the loss of this valuable frequency spectrum with the attendant financial and reliability losses.

It is hoped you and your staff will give thorough and careful attention to this matter and will become involved in bringing it to a fair and equitable conclusion for all parties involved.

Thank you for your consideration in this issue.

Sincerely,

SHO-ME POWER CORPORATION


John K. Davis
General Manager

JKD:ba

cc: Frank Stork, General Manager
Association of Missouri Electric Cooperatives