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Federal Communications Commission  
Office of the Secretary

**GEORGE F. BAILEY**

SUPERVISOR, SECOND DISTRICT  
CHAIRMAN  
SAN DIEGO COUNTY BOARD OF SUPERVISORS

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April 20, 1992

Federal Communications Commission  
Washington, DC 20554

FCC MAIL BRANCH

RE: ET DOCKET NO. 92-9, FCC 92-20 -- REDEVELOPMENT OF  
SPECTRUM TO ENCOURAGE INNOVATION IN THE USE OF NEW  
TELECOMMUNICATIONS TECHNOLOGIES

Dear Sir:

On behalf of the County of San Diego I wish to convey our opposition to the FCC proposal to reallocate the 1850-1990, 2110-2150, and 2160-2200 MHz bands now reserved for public safety users, to "emerging technologies." The FCC proposes that one of the County of San Diego's primary public safety microwave systems be moved to higher frequencies, or use "alternative media," assuming there is an alternative available.

To minimize the cost to the existing fixed microwave users (including the County of San Diego), the FCC has proposed:

- 1) Allowing the County to remain co-primary with all new services for a fixed time, or being required to abandon equipment paid by the tax payer over a phased period;
- 2) Designating the County's public safety system a secondary user; or
- 3) Allowing the County public safety system to remain as the primary user indefinitely, but licensing new microwave operations as secondary users. Already the FCC has notified us that an addition to our trauma / emergency medical services network will receive a "secondary license."

The County of San Diego has relied on the long-standing frequency allocation of the FCC for the 2 GHz spectrum and has designed the regional public safety communications system around this fact. To be required to change at this time will be a great waste of taxpayers' funds spent on planning, property acquisition, and equipment. The use of the higher frequencies is greatly limited

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by the geography of the San Diego region, environmental areas controlled by State and federal agencies, and existing land use. It could cost the County of San Diego hundreds of thousands of dollars to replace the 2 GHz microwave system which is the backbone of the public safety communications system. The County cannot afford to reconstruct its public safety communications system using a higher frequency or an alternative media such as fiber optic cable.

Local government must provide a public safety communications system that meets the current and future needs of its region with limited funding. Compounding this challenge is the shrinking number of frequencies available for emergency public safety use in the San Diego region.

Public safety communications systems should never be considered secondary users because safety and well-being of the public is of paramount importance. Requiring the County's public safety system to become a secondary user would endanger the safety of every individual within the region. Further, maintaining a regional public safety communications system as a primary user, while limiting any expansion of the system to secondary status, could have the practical effect of prohibiting expansion of the system because any expansion would be subject to preemption by another primary user.

The FCC has a moral and legal responsibility to provide public safety frequencies to assure that local government can protect the safety of the public in rural and urban environs. This proposal is not consistent with this basic tenet.

Sincerely,

  
George F. Bailey  
Chairman

San Diego County Board of Supervisors

GFB:bb

cc: Board of Supervisors  
Sheriff  
Department of Information Services  
Department of Health Services  
Washington Representative