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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JUN - 1 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RM-7981

In the Matter of)
)
Amendment of Parts 2, 21 and 94)
of the Commission's Rules to)
Provide for Use of Frequencies)
in the 1.71-1.85, 3.7-4.2,)
5.925-6.425, and 10.7-11.7 GHz)
Bands by Private Microwave Systems)
Licensed Under Part 94)

TO: The Commission

STATEMENT OF AMERICAN PERSONAL COMMUNICATIONS

American Personal Communications ("APC")^{1/} generally supports the constructive proposals of the Utilities Telecommunications Council ("UTC") in the above-referenced Petition for Rule Making (the "Petition").

1. APC supports UTC's proposals for rechannelizing the 3.7-4.2, 5.925-6.425, and 10.7-11.7 GHz bands to the extent that UTC's proposals facilitate the relocation of existing users in the 2 GHz band to bands above 3 GHz, provided UTC's proposals impose minimum burdens on incumbent licensees in those higher bands.^{2/}

^{1/} American PCS, L.P., d/b/a American Personal Communications.

^{2/} The Petition for Rule Making filed May 22, 1992, by Alcatel Network Systems, Inc. contains specific rechannelization proposals for the 3.7-4.2, 5.925-6.425, 6.525-6.875, and 10.7-11.7 GHz bands. APC supports these plans to the extent that they are acceptable to the microwave community. Alcatel's other proposals appear to APC to be unnecessary or counterproductive -- for example, although Alcatel's channelization plan for the 3.7-4.2 GHz band appears reasonable, APC is surprised that Alcatel would

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2. APC supports the exploration of the 1.71-1.85 GHz band for private point-to-point communications. APC believes that the current efforts of the staffs of the Commission and the National Telecommunications and Information Administration on this score should be continued.^{3/}

3. APC does not believe, however, that an "industry advisory committee" should be formed to consider these issues. The appropriate industry forum for consideration of point-to-point issues is the Point-to-Point Radio Section of the Telecommunications Industry Association, which will provide appropriate guidance to the Commission in its comments. Another "advisory" committee would be duplicative and would inject substantial delay without any offsetting benefit.

clearing that band of satellite users by a date certain when Alcatel seems to oppose similar treatment for 2 GHz microwave users. Alcatel's proposals for reallocating the 3.6-3.7 and 10.55-10.68 GHz band also appear entirely unnecessary for purposes of reforming technical rules to permit bands above 3 GHz to be used by private microwave users. Alcatel's petition should be accepted as comments on UTC's Petition.

^{3/} See Letter from the Commission to Sen. Ernest F. Hollings, April 20, 1992 (en banc). APC notes that UTC does not suggest that the 1.71-1.85 GHz band be used for new technologies such as personal communications services ("PCS"), a suggestion other incumbent users have implied but which APC strongly opposes. See Opposition of APC to Petition to Suspend Proceeding (ET Docket 92-9, filed April 20, 1992).

4. APC also does not believe any justification exists for suspending ET Docket 92-9 while the Commission considers UTC's proposals. See Initial Procedural Comments of APC on UTC's Petition (Docket 92-9, filed April 13, 1992).

Respectfully submitted,

AMERICAN PERSONAL COMMUNICATIONS

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CERTIFICATE OF SERVICE

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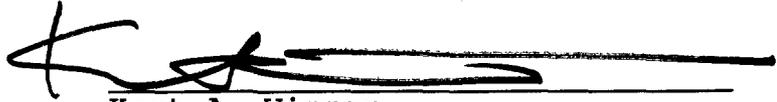
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A handwritten signature in black ink, appearing to read 'Kurt A. Wimmer', is written over a horizontal line.

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