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June 8, 1992

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna Searcy
Secretary of Federal
Communications Commission
1919 M Street, N.W.
Washington, D.C. 20054

RE: Redevelopment of Spectrum for Emerging Technologies
ET Docket No. 92-9

Dear Ms. Searcy:

Transmitted herewith on behalf of Alascom, Inc., Telephone Utilities of Eastern Oregon, Inc. and Telephone Utilities of Washington, Inc., are an original and 9 copies of its comments in the above captioned proceeding.

In the event that there are any questions concerning this matter, please communicate with the undersigned.

Very truly yours,


George Y. Wheeler

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ORIGINAL

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

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JUN 8 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Redevelopment of Spectrum to)
Encourage Innovation in the)
Use of New Telecommunications)
Technologies)

ET Docket No. 92-9

To: The Commission

COMMENTS OF THE ALASCOM, INC.,
TELEPHONE UTILITIES OF EASTERN OREGON, INC. AND
TELEPHONE UTILITIES OF WASHINGTON, INC.

Alascom, Inc., Telephone Utilities of Eastern Oregon, Inc.
and Telephone Utilities of Washington, Inc. (collectively "Comme-
ntors"), on behalf of themselves, by their attorneys, submit
their comments regarding the Commission's Notice of Proposed
Rulemaking in the above-captioned proceeding.

Each of the Commentors is a telephone common carrier provid-
ing essential public telecommunications service in predominantly
rural areas of Alaska, Oregon, Washington and other states.
Collectively they hold licenses for more than eighty 2 GHz
microwave stations which potentially are subject to displacement
under the Commission's proposals.

The Commentors recommend that the proposed procedures for
relocation of authorized 2 GHz microwave links to new frequency
bands or to non-radio transmission media be modified to eliminate
any mandatory termination of co-primary rights. Each 2 GHz

licensee should have the right to continue to operate his authorized facilities on a co-primary basis until that right is voluntarily relinquished.

Procedures should also be adopted so that new or additional 2 GHz common carrier microwave links can be added on a co-primary basis when the links involved are part of a planned or ongoing microwave construction program. Commentors have in excess of twenty-two such ongoing engineering projects already planned or in various stages of implementation over the next twenty-four months. The 2 GHz microwave links involved are intended for telephone trunking to support essential local exchange operations, in many cases serving sparsely populated remote areas where technical and cost considerations are important determinants. The public interest would not be served if these ongoing projects are disrupted because the links involved are not given co-primary status.

We support the Commission's broad goals to make spectrum available for emerging technologies subject to appropriate conditions which will assure that new users of 2 GHz spectrum do not disrupt, impair or otherwise adversely affect existing public

telecommunications services provided over 2 GHz microwave facilities. As common carriers obligated under state franchises and subject to the Communications Act, we oppose any Commission action which would lead to the impairment or disruption of the essential telephone services which are provided over our 2 GHz common carrier microwave facilities. The Commission should adopt expanded safeguards for existing 2 GHz common carrier microwave users as discussed here.

Respectfully submitted,

ALASCOM, INC.
TELEPHONE UTILITIES OF EASTERN OREGON, INC.
TELEPHONE UTILITIES OF WASHINGTON, INC.

By /s/ George V. Wheeler
George V. Wheeler

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Their Attorneys

June 8, 1992