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May 8, 1992

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D. Allan Bromley  
Assistant to the President for Science & Technology  
Director, Office of Science & Technology Policy  
Old Executive Office Building  
17th St. & Pennsylvania Ave., N.W.  
Washington, D.C. 20500

JUN 25 1992

Federal Communications Commission  
Office of the Secretary

Re: FCC ET Docket 92-9, -- Redevelopment of  
Spectrum to Encourage Innovation in the  
Use of New Telecommunications Technologies

Dear Mr. Bromley:

As you are probably aware, the Federal Communications Commission ("FCC") has initiated the above-referenced proceeding to reallocate currently used spectrum for the use of new telecommunications technologies. In particular, the FCC has proposed to reallocate certain frequencies between 1.85-2.20 GHz (commonly referred to as the "2 GHz Band"). This reallocation would require existing users of these frequencies to move their operations to other, less desirable frequencies or to implement other, less suitable transmission methods. OCOM Corporation ("OCOM") requests your assistance in encouraging the FCC to use alternative means to allocate frequencies for emerging technologies.

OCOM offers private-line telecommunications services\* throughout the State of Ohio using frequencies

\* Private line services consist of the transmission of communications between two or more points designated by the end user over facilities constructed and dedicated specifically for such communications.

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between 1.85-2.20 GHz.\* In addition to OCOM, the FCC's proposal would oust from their current spectrum gas, water and electric utilities, railroads and cellular telephone companies that use microwave facilities to connect their systems to the telephone network. These entities provide service to literally millions of customers. OCOM alone serves cellular companies that serve more than 140,000 cellular subscribers.

The proposed reallocation would disrupt and degrade the quality and reliability of the services OCOM (and other similarly situated entities) currently provides. The FCC's proposal to move existing 2 GHz Band users to higher frequencies or to require them to use alternative transmission methods is unsatisfactory. At higher frequencies, the quality of OCOM's operations would be dramatically reduced. Even with costly re-engineering, OCOM's system would not be likely to operate as reliably as it currently does. In addition, not all of the costs resulting from relocation will be passed on to the new users of the spectrum. Similarly, for OCOM to switch to alternative transmission methods such as fiber optics or cable would be expensive, inefficient and would degrade the flexibility and suitability of its existing system.

Further, requiring existing carriers like OCOM and their customers to absorb these penalties is particularly unfair because underutilized spectrum is available at other frequencies that the FCC declined to consider in developing its proposal. For instance, the FCC failed to, but should, consider underutilized spectrum currently allocated for government use. Proposals are pending in Congress to open up such spectrum for non-government use. See H.R. No. 531, S. No. 218. Such spectrum could be allocated to new technologies largely without disrupting the service of existing users.

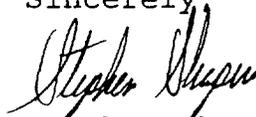
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\* Of the 137 microwave stations currently owned and operated by OCOM, almost two-thirds operate in the 2 GHz Band that the FCC proposes to reallocate.

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As Senator Hollings stated in his April 6, 1992 letter to FCC Chairman Alfred Sikes, a primary concern here is whether the FCC, "in its rush to promote a new technology, . . . has not considered fully the needs expressed by existing users of the spectrum." OCOM respectfully suggests that this is the case. Other existing 2 GHz Band users apparently agree, as evidenced by the flurry of activity recently regarding the FCC's proposal. The Utilities Telecommunications Council, for example, which represents all types of gas, water and electric utilities, has asked the FCC to defer its action in ET Docket 92-9 until it has adopted appropriate standards to ensure that the needs of existing 2 GHz Band users will be adequately accommodated. Accordingly, OCOM urges you to take efforts (or support those that Senator Hollings or other Members of Congress may be taking) to redirect the FCC's rulemaking away from destabilizing operations of providers of vital telecommunications services.

Sincerely,



Stephen Shapiro  
Senior Vice President