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June 25, 1992

HAND DELIVERED

Ms. Donna Searcy
Office of the Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

Re: In the Matter of Redevelopment of Spectrum to Encourage
Innovation in the Use of New Telecommunications
Technologies; ET Docket No. 92-9

CORRECTED PAGE 13 OF QUESTAR CORPORATION COMMENTS

Dear Ms. Searcy:

Attached is the original and 11 copies of the corrected
Page 13 of the above-referenced Comments which were filed
June 8, 1992. Due to a problem with the printing of this page,
the final line of the text was not fully printed. Accordingly,
this page should be replaced and we respectfully request that the
enclosed corrected pages be substituted for the page 13 currently
in the Comments.

Thank you in advance for your assistance in this matter, and
we apologize for any inconvenience this may cause. Should there
be questions or further concerns with regard to this matter,
kindly contact the undersigned directly at the above-referenced
number.

Very truly yours,



Rick D. Rhodes

Enclosures

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JUN 25 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

(ITFS) use very little of the spectrum allocated to these services.^{13/} Another 120 megahertz of spectrum is available from the band 1.99-2.11 GHz. While this band is used for "broadcast auxiliary" operations which undoubtedly have some social value, the Commission has arbitrarily assigned such uses greater value than the health and safety protection operations now conducted in the target spectrum. This is an especially egregious choice because the use of OFS systems has increased substantially over the past decade in order to better ensure the public safety, while much of the electronic news gathering (ENG) activity performed in the broadcast auxiliary band has migrated to satellite technology in recent years. Moreover, broadcast auxiliary as well as MDS and ITFS operations do not require the absolute reliability which OFS operators must have to adequately protect the public health and safety.

^{13/} While the Commission notes that several thousand applications for assignments in the MDS are pending, these applicants have no claim to a specific spectrum home on the basis of a simple application to the Commission. Additionally, Commission records indicate that only 94 "constructed and operational" wireless cable systems now operate in the entire U.S. Certainly these few users could more easily be moved to higher range spectrum which is adequate to meet their needs than could the thousands of OFS licensees who rely on long distance transmission properties of 2 GHz spectrum to meet their critical needs. Since the MDS and ITFS services generally operate over shorter range distances than the long haul OFS paths necessary to protect the public safety, the Commission could easily move the few licensees now operating in these bands to higher range frequency bands and could grant pending requests for authorization in the higher frequency ranges since higher range spectrum is readily available and will adequately perform in relatively short-distance operations such as MDS and ITFS.