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PACIFIC X TELESIS
Group - Washington

July 2, 1992

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna Searcy
Secretary
Federal Communications Commission
1919 M Street, NW Room 222
Washington, DC 20554

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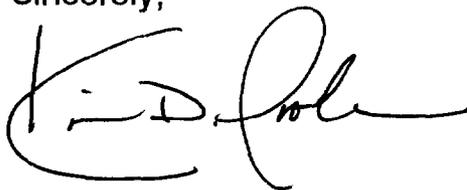
Dear Ms. Searcy:

RE: RM - 8004

On behalf of *Pacific Telesis Group*, please find enclosed an original and six copies of its "**Comments**" in the above proceeding.

Please stamp and return to confirm your receipt. Please call me if you have any questions or need additional information concerning this matter.

Sincerely,



Enclosures - 7

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

In the Matter of)	
)	
Amendment of Parts 2, 21, 25 and 94)	RM-8004
of the Commission's Rules to)	
Accommodate Common Carrier)	
and Private Op-Fixed Microwave)	
Systems in Bands Above 3 GHz)	
)	

COMMENTS OF PACIFIC TELESIS GROUP

Pacific Telesis Group ("Telesis") is in complete agreement with the fundamental premise of the Petition for Rule Making filed by Alcatel Network Systems, Inc. ("Alcatel"). If the 4, 6 and 11 GHz bands are to be used by those currently using the 1.8-2.2 GHz bands, as the Commission has suggested in its NPRM on Spectrum Reallocation, ET Docket No. 92-9, substantial rule changes are necessary. However, we have some serious reservations about one of Alcatel's specific proposals.

I. The Need For Rule Changes

Alcatel is correct in saying that "without specific rule changes, controlled and orderly migration [out of the 2 GHz band] is not possible." (Alcatel's Proposed Rules for Frequency Reallocation, at 1) The rule changes must be known to all parties in advance, and time for comments must be given. Telesis also agrees with Alcatel's statement of the need for rechannelization of some bands above 3 GHz, to

accommodate low capacity radio systems displaced from the 2 GHz bands. (Id. at 78-79) Telesis notes that others have indicated, in the Spectrum Reallocation NPRM (ET Docket No. 92-9), their agreement with these basic principles.

II. Problems With Alcatel's Proposals Concerning The Common Carrier Bands

We have, however, serious reservations about allowing private users into the common carrier bands--particularly the 6 and 11 GHz common carrier bands. With the 4 GHz common carrier band essentially closed to growth due to potential interference to earth stations, the 6 and 11 GHz bands are the only long haul, high capacity bands available to common carriers. Alcatel proposes (Id. at 14) that the private users and common carriers pool their current spectrum allocations in these bands. Alcatel's proposal for the 4 GHz band need not be discussed, since this band is unavailable. Excluding the 4 GHz band, under the Alcatel proposal, private carriers would contribute their 350 MHz in the upper 6 GHz band, while the common carriers would contribute 500 MHz in the lower 6 GHz band, and 1,000 MHz in the 11 GHz band. Telesis opposes this suggestion. The common carrier bands should remain dedicated to common carriers.

Under Alcatel's proposal, the 350 MHz to be contributed by the private users is narrowband channelized, but the common carrier need is principally for broadband (multi-DS3) capacity. Alcatel asserts (Id. at 79) that multi-channel, high capacity radio routes are mostly a thing of

the past and that multiple DS3 high capacity frequency slots are seldom required. Alcatel's assertion is far from the case for Pacific Bell and, we believe, for other common carriers. Although subsidiaries of Telesis have several single-channel radio routes, these subsidiaries also have many multi-channel radio routes in the 6 and 11 GHz bands, some of which we are unable to expand as we need due to lack of interference-free frequency slots. Allowing private users to compete for and partition these broadband common carrier frequencies would only exacerbate the present shortage of slots. Therefore, Telesis opposes any attempt to reduce the multi-DS3 capacity.

In addition, in the 6 and 11 GHz bands, Alcatel proposes to sub-divide each 30 MHz channel into three 10 MHz channels for 1xDS3 radios (Id. at 28). It then suggests that a 1xDS3 user select the center slot and reserve the adjacent 10 MHz slots for possible expansion to 3xDS3. The problem with this scheme is that if that channel doesn't grow beyond 1xDS3, adjacent channel and polarization constraints will probably prevent those adjacent 10 MHz channel slots from ever being used by anyone else within the local area. Thus, even if that channel is employing only 10 MHz of bandwidth, it is still tying up a full 30 MHz frequency slot. The Commission can ill afford to adopt proposals which may result in scarce spectrum being licensed but unused. Therefore, Alcatel's proposal should be rejected.

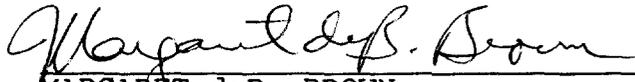
Moreover, if the narrowband slots become crowded, some users may be tempted to overstate their channel loading and file for medium (10 MHz) frequency slots just because they are available to them. If this occurs, users with just a handful of circuits will be tying up a wide bandwidth frequency slot capable of accommodating a full DS3 facility of 2016 voice circuits. Telesis suggests that users with low capacity needs should be accommodated, but should not be permitted to consume wideband frequency slots. This inefficient use of the frequency spectrum can be prevented by not sub-dividing the designated wideband (30 MHz) frequency slots for medium capacity (10 MHz) application.

In summary, we agree that portions of the 6 and 11 GHz bands should be sub-divided for narrowband frequency slots. But the portions of the band set aside for wideband (30 MHz) channels should remain undivided.

We also believe that the distinction between common carriers and private users should remain. The present 6 and 11 GHz common carrier bands should remain available only to common carriers. Allowing private users into these bands would needlessly dissipate wideband frequency slots and inhibit full utilization of high capacity radio routes.

Respectfully submitted,

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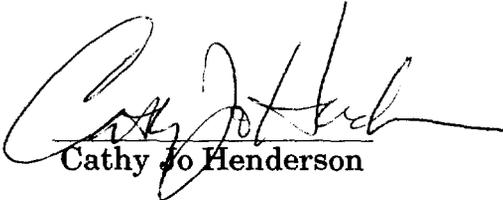
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Its Attorneys

Date: July 2, 1992

CERTIFICATE OF SERVICE

I, Cathy Jo Henderson, hereby certify that a copy of the foregoing Comments of Pacific Telesis Group in RM-8004 was mailed first-class United States mail, postage prepaid, this 2nd day of July, 1992 to the party listed below.


Cathy Jo Henderson

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