

ORIGINAL

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

ORIGINAL FILE

In the Matter of)
)
Amendment of Parts 2, 21, 25 and 94)
of the Commission's Rules to)
Reallocate Frequencies in the)
3.6-3.7, 3.7-4.2, 5.925-6.425,)
6.525-6.875, 10.55-10.68, and)
10.7-11.7 GHz Bands to Permit Sharing)
By Common Carriers and Private)
Operational Fixed Microwave Systems)

RM-8004

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

TO: The Commission

STATEMENT OF AMERICAN PERSONAL COMMUNICATIONS

American Personal Communications ("APC")^{1/} generally supports the consideration of proposals to facilitate the relocation of existing users in the 2 GHz band to bands above 3 GHz provided that these proposals impose minimum burdens on incumbent licensees in those higher bands, as APC stated in its comments on the similar petition filed by the Utilities Telecommunications Council ("UTC") (RM-7981).

Although APC does not agree with the entirety of Alcatel's substantive proposals,^{2/} APC does believe that the

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

^{2/} APC supports Alcatel's rechannelization proposals for the 3.7-4.2, 5.925-6.425, 6.525-6.875, and 10.7-11.7 GHz bands 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 propose 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

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proposals of UTC and Alcatel should be considered by the Commission. Accordingly, APC supports the consideration of Alcatel's petition in a manner that does not obstruct or delay ET Docket 92-9.

Respectfully submitted,

AMERICAN PERSONAL COMMUNICATIONS

By:


Jonathan D. Blake
Kurt A. Wimmer

Mr. J. Barclay Jones
Vice President for
Engineering

AMERICAN PERSONAL
COMMUNICATIONS
1025 Connecticut Ave., N.W.
Washington, D.C. 20036

COVINGTON & BURLING
1201 Pennsylvania Avenue, N.W.
Post Office Box 7566
Washington, D.C. 20044
(202) 662-6000

Its Attorneys

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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.

CERTIFICATE OF SERVICE

I, Kurt A. Wimmer, hereby certify that a copy of the foregoing pleading has been sent by United States mail, postage prepaid and correctly addressed, or by hand delivery(*) to the following on this 2nd day of July, 1992:

Jeffrey L. Sheldon, Esq.
Sean A. Stokes, Esq.
Utilities Telecommunications Council
1140 Connecticut Avenue, N.W., Suite 1140
Washington, D.C. 20036

Robert J. Miller, Esq.
Gardere & Wynne, L.L.P.
1601 Elm Street, Suite 3000
Dallas, Texas 75201

Thomas J. Keller, Esq.
Erwin G. Krasnow, Esq.
Lawrence R. Sidman, Esq.
Jacqueline R. Kinney, Esq.
Verner, Liipfert, Bernhard,
McPherson & Hand, Chartered
901 Fifteenth Street, N.W., Suite 700
Washington, D.C. 20005

Wayne V. Black, Esq.
Keller & Heckman
1001 G Street, N.W., Suite 500 West
Washington, D.C. 20001

The Honorable Alfred C. Sikes*
Chairman, Federal Communications Commission
1919 M Street, N.W., Room 814
Washington, D.C. 20554

The Honorable James H. Quello*
Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 802
Washington, D.C. 20554

The Honorable Sherrie P. Marshall*
Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 826
Washington, D.C. 20554

The Honorable Andrew C. Barrett*
Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 844
Washington, D.C. 20554

The Honorable Ervin S. Duggan*
Commissioner
Federal Communications Commission
1919 M Street, N.W., Room 832
Washington, D.C. 20554

Dr. Thomas P. Stanley, Chief*
Office of Engineering and Technology
Federal Communications Commission
2025 M Street, N.W., Room 7002
Washington, D.C. 20554

Mr. Rodney Small*
Office of Engineering and Technology
Federal Communications Commission
2025 M Street, N.W., Room 7332
Washington, D.C. 20554

David R. Siddall, Esq.*
Chief, Frequency Allocation Branch
Office of Engineering and Technology
Federal Communications Commission
2025 M Street, N.W., Room 7102
Washington, D.C. 20554

Mr. Thomas Mooring*
Office of Engineering and Technology
Federal Communications Commission
2025 M Street, N.W., Room 7330
Washington, D.C. 20554

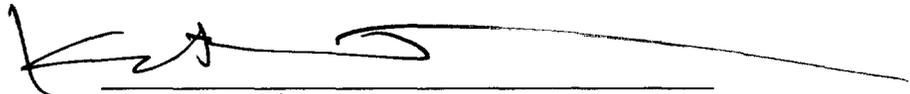
Dr. Robert M. Pepper, Chief*
Office of Plans and Policy
Federal Communications Commission
1919 M Street, N.W., Room 822
Washington, D.C. 20554

Cheryl A. Tritt, Esq., Chief*
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 500
Washington, D.C. 20554

Mr. Gerald P. Vaughn, Deputy Chief*
Common Carrier Bureau
Federal Communications Commission
1919 M Street, N.W., Room 500
Washington, D.C. 20554

Mr. Ralph Haller*
Chief, Private Radio Bureau
Federal Communications Commission
2025 M Street, N.W., Room 5002
Washington, D.C. 20554

Dr. Bruce A. Franca*
Deputy Chief, Office of Engineering &
Technology
Federal Communications Commission
2025 M Street, N.W., Room 7002
Washington, D.C. 20554



Kurt A. Wimmer