



U.S. Department
of Transportation

**Research and
Special Programs
Administration**

FCC MAIL SECTION

400 Seventh Street, S.W.
Washington, D.C. 20590

JUL 8 7 27 AM '92

RECEIVED

JUL 6 1992 BY

JUL - 6 1992

Federal Communications Commission
Office of the Secretary

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

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

Dear Ms. Searcy:

The Commission's proposal to relocate current users of the telecommunications spectrum to other frequency bands or to other means of communication is of vital concern to the Research and Special Programs Administration (RSPA), U.S. Department of Transportation. RSPA regulates over 2,200 operators of pipelines carrying crude oil, petroleum products, and natural gas through a transportation network of over 1.7 million miles.

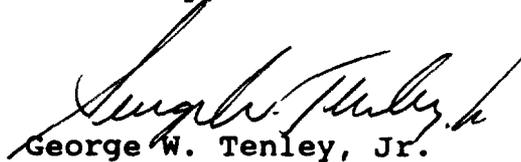
The safe and environmentally sound operation of pipelines depends on data and telemetry communications for monitoring pipeline pressures, temperatures, flow rates, and system loading. In a pipeline system, signals must be transmitted clearly and reliably for long distances. This communication path is also used to control unmanned pipeline facilities that are critically dependent on reliable telecommunication channels, which must be free from adverse impact from natural elements. The microwave band slated for reallocation is also used for field voice communications to remote areas and radio control of emergency operations. Finally, the most important and emerging advances in pipeline safety today are dependent on Supervisory Control and Data Acquisition telemetry communication for real time monitoring and control of a pipeline system operation, including its integrity, leak detection, and the ability to provide rapid response to any system breakdowns.

The FCC proposal to reallocate the 1,850 to 2,200 MHz band to emerging new technologies could adversely affect pipeline safety by forcing relocation to other less reliable frequency bands or other forms of communication. Relocation to a band having less favorable propagation characteristics would seriously derogate the operation of pipelines, which are critical to distribution of the nation's petroleum and natural gas for energy applications.

Given the known benefits of the current allocation of the spectrum band in question, we question the speculative benefits of providing these frequency bands to emerging communications technologies that have yet to prove their value to the American public.

If we can be of further assistance, please do not hesitate to contact Cesar De Leon, Director of Pipeline Safety Regulations, at 202-366-1640.

Sincerely,

A handwritten signature in cursive script, appearing to read "George W. Tenley, Jr.", written in dark ink.

George W. Tenley, Jr.
Associate Administrator for
Pipeline Safety