

HSD's. The addition of fixed microwave systems displaced from the 2 GHz band would impose a further major financial burden on HSD owners.

2) Interference from additional Fixed Service operations would compromise the ability of satellite operators to deliver ATV signals to the home in the future.

3) HSD would be the only multichannel video provider to be affected negatively by the reallocations proposed in the NPRM.

4) The decisions of WARC-92 have superseded the present Rule Making by making definitive frequency allocations for emerging technologies and setting forth the mechanisms for drafting the implementation procedures.

5) The Commission erred in its identification of possible reaccomodation bands by including the 11.7 - 12.2 GHz band and by not considering other bands which meet the Commission's criteria.

6) Any future consideration of reaccomodation bands should exclude the HSD and DBS downlink bands unless the Commission is willing to impose restrictions upon the fixed microwave systems to protect HSD and DBS installations from interference. Future consideration of reaccomodation bands should include government and

shared government/non-government bands as well as purely non-government bands both below and above 3 GHz.

As a result of these and other concerns, SBCA recommends that the Commission postpone further action on the NPRM pending a comprehensive and systematic review of the decisions of WARC-92 regarding frequency allocations for emerging technologies.



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