

ORIGINAL ORIGINAL
FILE

BEFORE THE

Federal Communications Commission

RECEIVED

WASHINGTON, D.C. 20554

AUG 12 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment to Section 90.621(c) and)
(d) of the Commission's Rules and)
Regulations Concerning Separations)
Between 800 and 900 MHz Land)
Mobile Radio Systems in the)
Business and General Category)
Radio Service Pools)

RM-8028

To: The Commission

**STATEMENT IN SUPPORT
OF THE
NEW ENGLAND POWER SERVICE COMPANY**

New England Power Service Company (NEPSCO), pursuant to Section 1.405(a) of the Rules and Regulations of the Federal Communications Commission (Commission), hereby respectfully submits this Statement in Support of the Petition for Rule Making of the National Association of Business and Educational Radio, Inc. (NABER) filed with the Commission on March 6, 1992.^{1/}

I. PRELIMINARY STATEMENT

1. NEPSCO is the engineering and service company of the New England Electric System (NEES). It provides communications, among other services, to the NEES operating

^{1/} Public Notice, Report No. 23944, Petitions for Rulemaking Filed, released July 13, 1992.

No. of Copies rec'd 019
List A B C D E

companies that operate electric power generation, transmission and distribution facilities throughout four New England states. These operating companies, serving over 1.2 million industrial, commercial and residential customers, include the New England Power Company, Massachusetts Electric Company, The Narragansett Electric Company, and Granite State Electric Company.^{2/} NEPSCO holds several licenses for its wide-area 800 MHz trunked system that is authorized for operations in the Commonwealth of Massachusetts and the State of Rhode Island. NEPSCO is therefore interested in any potential amendment to the Commission's rules that may affect the operation of this system.

II. BACKGROUND

2. NABER's Petition seeks amendment of the rules to provide for a more stringent contour separation standard between co-channel Private Land Mobile Radio Service stations that employ channel assignments from the Business

^{2/} New England Power Company is a wholesale generation and transmission company with facilities in Massachusetts, Vermont and New Hampshire. Massachusetts Electric Company provides service in Massachusetts. The Narragansett Electric Company is the principal electric company serving the State of Rhode Island. Granite State Electric Company provides service in the State of New Hampshire.

and General Category frequency pools. Adoption of the NABER proposal would change the current 40/30 dBu standard to a 40/22 dBu standard. NABER's proposal is similar to the rule amendment it recommended in the Commission's proceeding that was initiated to amend Section 90.621(b) of the rules and to strengthen the interference criteria for Specialized Mobile Radio (SMR) channels.^{3/} NABER has not, however, proposed the adoption of a 40/22 dBu table as was established for the SMR pool. Moreover, the current proposal does not include the Industrial/Land Transportation or Public Safety pools. NABER left to the Commission's discretion whether to address these two frequency pools in any rule making proceeding it might initiate in response to the petition.

III. STATEMENT IN SUPPORT

3. NEPSCO agrees with NABER that non-SMR licensees should be afforded a similar interference protection from co-channel systems. In a wide-area system configuration, such as NEPSCO's, the need for interference protection is extremely important to ensure complete operational coverage of the system throughout the service areas of each of the

^{3/} See Report and Order, (FCC 91-229), Amendment of Part 90 of the Commission's Rules to Permit the Short-Spacing of Specialized Mobile Radio Systems Upon Concurrence from Co-Channel Licensees, 6 FCC Rcd. 4929 (1991).

affiliated electric companies. Highly reliable communications are critical to ensure the efficient provision of electric power service and to promptly respond to reports of outage and other emergencies.

4. NABER's Petition, however, does not propose that the stricter interference standard be applied to the coordination of frequency assignments allocated to the Industrial/Land Transportation pool. NEPSCO recognizes that NABER does not represent the Industrial/Land Transportation eligibles and only included the services in its proposal for which it bears a responsibility. Amending Section 90.621(c) and (d) to provide a separate interference criteria for two of the four service pools governed by Section 90.621(c) and (d) is unacceptable and, most likely, unworkable in many circumstances. For example, NEPSCO's system, while being primarily authorized the use of channel pairs from the Industrial/Land Transportation pool, also include assignments from the Business pool. Consequently, the stricter interference standard is just as necessary for assignment of channels from the Industrial/Land Transportation pool as for channels included in the Business Category. Accordingly, NEPSCO supports NABER's Petition, but strongly urges the Commission to include in any rule making initiative an amendment to Section 90.621(c) and (d)

that provides a 40/22 dBu contour standard for the coordination of frequencies in all categories in the Industrial/Land Transportation, Business, Public Safety, and General Category pools.

WHEREFORE, THE PREMISES CONSIDERED, New England Power Service Company urges the Commission to grant the Petition for Rule Making filed by the National Association of Business and Educational Radio, Inc. and to expeditiously initiate a rule making proceeding to include the further request herein.

Respectfully submitted,

NEW ENGLAND POWER SERVICE COMPANY

By: Neil D. Deegan
Neil D. Deegan
Manager, Meter and
Communications Engineering

Of Counsel:

Wayne V. Black
Terry J. Romine
Keller and Heckman
1001 G Street, N.W.
Suite 500 West
Washington, D.C. 20001
(202) 434-4100

Dated: August 12, 1992