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Dockets

FEDERAL COMMUNICATIONS COMMISSION

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. Terry F. Steinbecker, President
St. Joseph Light & Power Company
520 Francis Street
St. Joseph, MO 64502

Dear Mr. Steinbecker:

Senator Bond has requested that I respond directly to you with regard to your letter regarding proposals to allocate 2 GHz spectrum to personal communications services (PCS) and other emerging technologies. You and Dwight Svuba, St. Joseph Light & Power Company's vice president-Power Supply, expressed concern to Senator Bond with the effect such action would have on St. Joseph's communications in the 2 GHz band.

In the Notice of Proposed Rule Making in ET Docket No. 92-9, adopted January 16, 1992, the Commission proposed allocating 220 MHz of the 2 GHz band to services employing emerging telecommunications technologies. In this Notice, the Commission recognized the importance of the services provided by the fixed microwave licenses now operating in the 2 GHz band, and emphasized that any relocation of these licensees to other bands must prevent disruption to their operations. Accordingly, the Notice proposed to allow these licensees to continue to occupy 2 GHz frequencies on a co-primary basis with new services for a fixed period of time, such as ten or fifteen years, and proposed to make available to them all fixed microwave bands above 3 GHz via a "blanket" waiver of the eligibility requirements. More recently, in the Further Notice of Proposed Rule Making in ET Docket No. 92-9, adopted on August 5, 1992, the Commission proposed reallocation and rechannelization plans as well as technical rules to accommodate 2 GHz licensees in the higher bands.

In a related matter, in the Notice of Proposed Rule Making in GEN Docket No. 90-314, adopted on July 16, 1992, the Commission proposed allocating to PCS approximately half of the 220 MHz under consideration in Docket 92-9, contingent upon a final decision in the latter proceeding. In this Notice the Commission reiterated its intent to fully preserve the quality of service offered by 2 GHz fixed microwave licensees and solicited comment on accommodating negotiations with new users.

I am enclosing a copy of the Notice of Proposed Rule Making in ET Docket No. 92-9 and copies of the press releases of the Notice of Proposed Rule Making in GEN Docket No. 90-314 and the Further Notice of Proposed Rule Making in ET Docket No. 92-9. The text of the latter two documents will be

released in mid-August and early September, respectively. To ensure full consideration of your views, I am placing your letter in the record of both GEN Docket No. 90-314 and ET Docket No. 92-9.

Sincerely,

Bruce Franca

for Thomas P. Stanley
Chief Engineer

Enclosures

CHRISTOPHER S. BOND

MISSOURI

COMMITTEES:

APPROPRIATIONS
BANKING, HOUSING AND
URBAN AFFAIRS
SMALL BUSINESS
BUDGET

United States Senate

WASHINGTON, DC 20510-2503

July 20, 1992

CCB
90-314

2185

Federal Communications Commission
1919 M Street
Washington, D.C. 20554

Dear Sir or Madam:

Enclosed please find a copy of a letter sent to me by one of my constituents concerning General Docket 90-314. Because this is an issue over which your department has jurisdiction, I thought you would be interested to know about it.

I would appreciate a response to the enclosed letter at your earliest convenience. Please feel free to respond directly to my constituent who has been notified of our contact and will be awaiting your reply. Also, please forward a copy of your response to my office.

Thank you in advance for your attention to this matter.

Sincerely,



Christopher S. Bond

CSB/bm
Enclosure

The

Company



ST. JOSEPH LIGHT & POWER COMPANY

520 FRANCIS STREET • ST. JOSEPH, MISSOURI 64502 • 816-233-8888

TERRY F. STEINBECKER
President

January 3, 1992

The Honorable Christopher S. Bond
Russell Office Building
Washington, DC 20510-2503

Dear Senator Bond:

St. Joseph Light & Power Company is very concerned about the proposal of the Federal Communications Commission to move existing utility users from the 2-GHz microwave band. Other users of this band have expressed similar concerns.

For your information, I am enclosing a copy of a letter from Dwight V. Svuba, our vice president-Power Supply, to the Federal Communications Commission that outlines some of our concerns with this proposal. It is a matter of considerable importance to us, and I would appreciate any help you may be able to provide.

Vicki Schaff, federal affairs representative for the Missouri Investor-Owned Electric Utility Companies, is very familiar with the concerns of Missouri utilities in this matter. Should you or your staff need any additional information, I am sure either Vicki or Dwight Svuba would be happy to provide it.

Thank you very much for any assistance you may be able to provide on this issue.

Sincerely,

jm

cc: Vicki Schaff

The



ST. JOSEPH LIGHT & POWER COMPANY

520 FRANCIS STREET • ST. JOSEPH, MISSOURI 64502 • 816-233-8888

January 3, 1992

DWIGHT SVUBA
Vice President—Power Supply

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: Personal Communications Services (PCS) Inquiry -- Gen Docket 90-314

Dear Ms. Searcy:

St. Joseph Light & Power Company hereby submits its comments regarding the Federal Communications Commission's PCS Inquiry and recent En Banc hearing regarding PCS.

St. Joseph Light & Power Company is an investor-owned utility serving a 3,300-square-mile area in 10 northwest Missouri counties. Light & Power provides electric energy to more than 59,000 customers in 74 cities, towns and villages, and in a large rural area. The home office is in St. Joseph, a city of about 73,000. That represents about one-half the population of the service territory. St. Joseph Light & Power Company has been in the public utility business since 1883. It became an independent, investor-owned business in 1950. St. Joseph Light & Power has about 6,000 shareholders, representing all 50 states. The company's stock is traded on the New York Stock Exchange.

SJLP currently has a total of fourteen (14) stations in the 1.85-2.20 GHz frequency range. Two (2) of these use the 1.85-1.99 GHz band. The other twelve (12) use 2.13-2.20 GHz. The SJLP cost to replace these stations with equipment that operates on 6 GHz could easily be in excess of \$1,000,000. To move to a higher frequency could be significantly more.

SJLP opposes a reallocation of spectrum in the 1850-2200 MHz band for the development of Personal Communications Services (PCS). Independent circuits, supplied by microwave, allow instantaneous monitoring and control of power system facilities. Circuits supplied by satellite transmission or common carrier do not have the continuous reliability necessary for utility use in most cases. Higher frequency bands have less favorable propagation characteristics than the 1.85-2.2 GHz microwave frequency band. The 18 & 23 GHz bands are susceptible to fading during periods of heavy rain. Higher frequencies (6 GHz and above) require more sites with tighter alignment and deflection specifications, thereby reducing reliability and adding expense to the installation and operation of the microwave system.

Fiber optic systems cannot replace many of these microwave routes. The high data-rate transfer capacity of fiber is not required, and cannot be justified, in most of the critical utility applications where microwave is used. A fiber optic cable cut can take hours or days to restore.

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
January 3, 1992
Page 2

The consumer should not be expected to give up the present economy and reliability for the uncertain benefit of an "emerging technology". Especially since PCS can be easily accomplished in another frequency band.

St. Joseph Light & Power Company understands that certain proponents of PCS are claiming that PCS can share the fixed microwave bands through the use of spread spectrum or other techniques. St. Joseph Light & Power Company is skeptical of these claims, and urges the FCC to review these claims carefully before authorizing PCS on a band-sharing basis. St. Joseph Light & Power Company depends heavily on its microwave communications, and any disruption or interference could not be tolerated.

In no event should a fixed microwave user be forced to relocate from the 1850-2200 MHz band until: (1) there is adequate replacement spectrum made available in close proximity to the 1850-2200 MHz band; (2) adequate time is allowed to construct replacement facilities; and (3) the cost for any relocation is paid for by the PCS licensee. Any compensation for the relocation of existing users should be arrived at through negotiations between the existing user and the PCS licensee.

Very truly yours,



Dwight Svuba
Vice President - Power Supply

/dd