

IV. CONCLUSION

The nation's utility industry places extensive reliance on private microwave systems operating in the 2 GHz band to meet critical communications needs. Utilities cannot tolerate interference to their microwave systems without compromising safety and reliability of service to the public. Utilities and other existing 2 GHz private microwave users must be assured interference protection equal to or better than the current level of protection.

In order to support PCS systems UTC suggests that the FCC allocate between 90 and 120 MHz of spectrum should be allocated for licensed PCS use. Twenty megahertz (20 MHz) of this licensed PCS spectrum should be reserved for non-commercial, internal use by traditional Private Radio Service eligibles. These internal requirements must be supported apart from the commercial uses that the FCC has contemplated exclusively thus far in its PCS rule making. Licensee selection for both non-commercial and commercial PCS licenses should be by lottery. UTC favors adoption of a lottery requiring applicants to include complete financial and technical showings with every application, to limit applicants to those with sufficient financing, experience and interest.

WHEREFORE, THE PREMISES CONSIDERED, the Utilities Telecommunications Council respectfully requests the Federal Communications Commission to take action consistent with the views expressed herein.

Respectfully submitted,

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