

Before the
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

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RM-8159

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Petition to Authorize Co-Primary)
Share of the 450 MHz Air-Ground)
Radiotelephone Service with BETRS)

COMMENTS FROM THE
CITY OF KETCHIKAN, ALASKA d/b/a
KETCHIKAN PUBLIC UTILITIES

The Telephone Division of Ketchikan Public Utilities (KPU) respectfully submits its comments in support of the joint petition for rulemaking (RM-8159). Ketchikan Public Utilities Telephone Division is a local exchange carrier currently providing service to 8,424 access lines in the Southeastern area of Alaska.

Since authorized by the Commission in 1988, Basic Exchange Telecommunications Radio Service (BETRS) has been shown to be a cost-effective method for providing local exchange service in rural areas. Equipment has been developed for, and the BETRS service has evolved in, the frequencies at 450 MHz. Within this band, however, there are only 26 available frequencies. This shortage of usable spectrum has limited BETRS applications and frustrated the growth of the service.

KPU is interested in seeing additional frequencies allowed on the 450 MHz band due to the fact that part of our serving area is on an adjacent island in a remote area. BETRS would, in this case, be a cost-effective method to bring telephone service to this area.

The joint petition seeks to make available additional spectrum contiguous to the existing 450 MHz band on a co-primary basis. Exchange carriers and their customers can benefit from expansion of channels for BETRS in the 450 MHz band with no interference to any remaining users of the spectrum. Providing access to these channels will strongly promote the public interest in universal, cost-effective telephone service. Ketchikan Public Utilities Telephone Division strongly supports the joint petition and asks the Commission to commence a rulemaking promptly and to grant the petition.

John A. Magya

Telephone Manager

2/5/93
Date

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