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VILLAGE OF CELORON

21 Boulevard Avenue
CELORON, NEW YORK 14720
Phone: 487-4175
Area Code: 716

DOCKET FILE COPY ORIGINAL

RECEIVED
MAR 29 1993
FCC MAIL ROOM

March 22, 1993

Ms. Donna Searcy, Secretary
Federal Communications Commission
1919 M Street NW Room 222
Washington, DC 20554

Dear Ms. Searcy:

RE: PR DOCKET NO. 92-235 OPPOSITION TO DOCKET

As an end user of public safety and/or special emergency frequencies, I would like to voice my opposition to "spectrum refarming" as outlined in notice of proposed rule making #92-235. While public safety interests are unique from other spectrum users due to the public safety considerations, this distinction is not addressed in this proposal. Some major points of concern are listed below.

The possibility of having to replace existing equipment and expand the number of transmitter sites puts a tremendous fiscal burden on the governmental entities. These agencies cannot expect to bear this extra financial burden in this time of budget cutbacks.

Power limitations based on height above average terrain and fifty mile separations are not practical in public safety applications where a specific geopolitical area must be covered.

There is not provision for mutual aid and inter agency operations. Such operations form the backbone of emergency communications.

There is also no provisions for eliminating potential interference from existing Canadian stations.

The time table for implementation of narrow channel spacing will not be effective unless all stations change system standards simultaneously. This, in reality, is impossible. There are also many questions pertaining to frequency coordination.

Technical standards necessary to support this proposal do not address a cost effective method of modifying existing equipment. There is evidence of problems with poor voice quality, tone squelch decoding, data transmission, and tone signaling. Tone signalling is the main method of alerting in public safety communications and replacement of existing equipment would be financially prohibitive.

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Considering the many financial and technical reasons for the public safety community to oppose these regulations and the potential compromise of the public safety, I request that the commission withdraw this notice of proposed rule making #92-235.

Sincerely,

VILLAGE OF CELORON

Timothy Campaign
Trustee

INCORPORATED

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APR - 7 1993
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Sincerely,

VILLAGE OF CELORON

Phyllis Pintagro

Phyllis Pintagro
Trustee

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Becky Goodell

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Sincerely,

VILLAGE OF GELORON

Becky Goodell

Becky Goodell
Trustee

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Sincerely,

VILLAGE OF CELORON

Richard E. Slagle
Mayor

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VILLAGE OF CELORON

Douglas Mabee

Douglas Mabee
Planning Board Chairman