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

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In the Matter of	)	
	)	
Amendment of Part 22 of the Commission's Rules Pertaining to Power Limits for Paging Stations Operating in the 931 MHz Band in the Public Land Mobile Service	)	CC Docket No. 93-116

To: The Commission

COMMENTS OF THE
UTILITIES TELECOMMUNICATIONS COUNCIL

Pursuant to Section 1.415 of the Commission's Rules, the Utilities Telecommunications Council (UTC) hereby submits its comments with respect to the Notice of Proposed Rulemaking (NPRM), 8 FCC Rcd 2796 (1993), released April 23, 1993, in the above captioned matter.

UTC opposes the adoption of rules that would allow non-nationwide common carrier paging facilities in the 931 MHz band to routinely operate at 3500 watts ERP as this is likely to cause significant interference to adjacent channel multiple address systems (MAS).

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I. INTRODUCTION

UTC is the national representative on communications matters for the nation's electric, gas, water, and steam utilities, and interstate gas pipelines. Approximately 2,000 utilities and pipelines are members of UTC, ranging in size from large combination electric-gas-water utilities serving millions of customers to small, rural electric cooperatives and water districts serving only a few thousand customers. All utilities depend upon reliable and secure communications facilities in carrying out their public service obligations. In order to control the safe and efficient distribution of energy many utilities operate extensive MAS systems. UTC is therefore pleased to have this opportunity to comment on the Commission's proposals.

II. COMMON CARRIER PAGING OPERATIONS IN THE 931 MHZ BAND SHOULD NOT BE ROUTINELY LICENSED TO OPERATE AT 3500 WATTS ERP

A. Background

In its NPRM the FCC proposes to revise the rules regarding effective radiated power (ERP) for common carrier paging facilities in the 931 MHz band. Currently the maximum permissible power level for transmitters operating in the 931 MHz band is 3500 watts ERP. Any transmitter on the nationwide paging network frequencies (931.8875 MHz, 931.9125 MHz and 931.9375 MHz) may be operated at 3500 watts ERP regardless of whether the licensee has constructed any co-channel transmitters in the vicinity. However, paging transmitters on the other 931 MHz

frequencies may not operate with 3500 watts ERP until after their interference area is totally encompassed by the composite interfering contour of existing co-channel transmitters of the same licensee. Transmitters located completely within existing system interference contours are allowed to operate at 3500 watts because the surrounding transmitters ensure that no co-channel station of another licensee is close enough to receive interference from, or cause interference to, the higher power

separation criteria for co-channel stations.

B. Increasing Power Limits Will Unnecessarily Increase Potential Interference To Adjacent MAS Operations

The Commission's proposal is ill-advised and unnecessary. A large number of utilities and other private radio licensees operate critical MAS systems in the 928 MHz and 932 MHz band. In many of the major urban areas utilities already experience excessive harmful interference from paging systems that are authorized to operate at 3500 watt ERP under existing procedures. High power paging operations often cause a reduction in MAS range due to the following factors:

- Receiver desensitization;
- Transmitter noise; and
- Intermodulation interference

To allow even more systems to operate at these power levels will only serve to exacerbate the situation.

The Commission has been alerted to the interference potential of high power paging systems for a number of years. In a Memorandum Opinion and Order (MO&O), in GEN. Docket 82-243, FCC 90-64, released March 15, 1990, the Commission acknowledged the potential for interference to MAS operations from paging operations in the 931-932 MHz band but declined to take any action on the basis that the potential interference would be no greater than that which might develop between point-to-point operations and point-to-multipoint.[1/] It must be noted that the

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[1/] MO&O, para. 25.

Commission's earlier decision was premised on an interference potential analysis that assumed paging transmitters would be operating at a maximum of 1000 watts ERP.[2/] In light of the dramatic increase in power now being proposed (more than three times greater) common sense would dictate that prior to taking any action the FCC should at least attempt to determine the interference potential to MAS systems posed by high power paging operation.

Further, the very arguments that the Commission raises in favor of allowing higher transmitting power - better building penetration and the ability to overcome man-made noise - illustrate the increased potential for interference of high power paging systems. Moreover, the Commission's proposed actions would appear to be unnecessary since common carrier paging operators are capable of obtaining authorization under the existing procedure or under grant of a rule waiver. The needs of common carrier paging licensees should not outweigh the needs of existing MAS users to operate their systems on an interference-free basis. UTC notes that it is indeed ironic that the FCC desires to increase the ERP of common carrier paging transmitters at precisely the same time as it is proposing that private land mobile operators decrease their allowable ERP, PR Docket No. 92-235, 7 FCC Rcd 8105 (1992).

[2/] Comments of Paging Network, Inc., Engineering Statement of Raymond C. Trott filed in Support of Petition for Reconsideration in GEN. Docket No. 82-243, p. 3.

In any event, at the very least prior to taking any action the Commission should adopt a method whereby the parties are required to cooperate to reduce or eliminate interference. One approach would be to require that applications for high power paging systems include a listing of all MAS master stations within one mile of the proposed site. The paging applicant would be required to contact each MAS licensee and advise them of the pending application and correct at their own expense all resulting interference problems to the satisfaction of the MAS licensee.

IV. CONCLUSION

The Commission should not amend its rules to allow non-nationwide common carrier paging licensees to routinely obtain authorization to operate at 3500 watts ERP as this will significantly increase the potential for harmful interference to MAS operations. The Commission should first study the potential interference to MAS systems and should adopt procedures whereby high power paging licensees remedy interference situations.

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

Respectfully submitted,

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June 17, 1993