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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Redevelopment of Spectrum to)
Encourage Innovation in the)
Use of New Communications)
Technologies)

ET Docket No. 92-9
RM-7981
RM-8004

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COMMENTS OF THE PUBLIC BROADCASTING SERVICE TO
PETITION FOR PARTIAL RECONSIDERATION OF
WESTERN TELE-COMMUNICATIONS, INC.

1. The Public Broadcasting Service ("PBS") hereby replies to and supports the Petition for Partial Reconsideration ("Petition") of Western Tele-Communications, Inc. ("WTCI"), filed on October 21, 1993, in the above-referenced proceeding.^{1/}

PBS SUPPORTS WTCI'S REQUEST THAT THE COMMISSION MAINTAIN ITS 4 GHz INTERLEAVED FREQUENCY PLAN.

2. WTCI's Petition states: "The 4 GHz frequency plans adopted in Parts 21 and 94 of the Rules should be corrected to reflect the intended presently existing frequency plans."^{2/} PBS concurs.

3. PBS became the first nationwide television broadcast program distribution system to implement interconnection service via satellite when it began providing its National Program Service to member stations via C-Band satellite on February 1,

^{1/} The Petition appeared on public notice on November 3, 1993. PBS had planned to file a reply to any oppositions in support of WTCI, but no timely oppositions were filed. PBS nevertheless submits this reply and requests that, if a reply is not acceptable, this pleading be treated as an ex parte presentation pursuant to Section 1.1206(a)(1) of the Commission's Rules.

^{2/} Petition at 7.

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1978. Today approximately 193 PBS member earth stations throughout the fifty states, Puerto Rico, and the Virgin Islands are served by this system.

4. PBS had to locate and frequency-coordinate each 4 GHz satellite downlink earth station in the system to be free of interference from the terrestrial microwave channels that share this band. In view of the complexities of this process and its importance to the reliability of the National Program Service, PBS took the further precautions of licensing the downlink earth stations and of subscribing to Comsearch's frequency coordination monitoring services. Each of these steps was intended to ensure that the member earth stations and the PBS National Program Service could continue to operate free of interference.

5. Most, if not all, of the current 4 GHz terrestrial microwave links and C-Band satellite downlinks either use or are compatible with the present interleaved channel plan. As WTCI's Petition notes, however, Sections 2.701(d) and 94.65(g) would replace this scheme with a high-low channel configuration plan. PBS agrees with WTCI that the high-low plan is inconsistent with the stated aim of the Second Report and Order not to change the existing channelization plan. PBS also believes that the introduction of a non-compatible high-low terrestrial microwave plan would threaten substantial interference to currently licensed satellite operations. The elimination of this interference would require otherwise unnecessary equipment and

coordination costs, and is likely to result in related service difficulties.

CONCLUSION

6. For the foregoing reasons, PBS supports that part of the WTCI Petition that opposes introduction of a high-low channel configuration plan at 4 GHz.

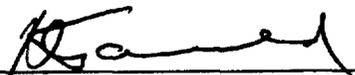
Respectfully submitted,

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November 29, 1993.

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused a copy of the foregoing Comments of the Public Broadcasting Service to Petition for Partial Reconsideration of Western Tele-Communications, Inc. to be sent by first-class mail, postage prepaid, to:

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November 29, 1993