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June 28, 1994

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

RECEIVED
JUN 28 1994
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: PR Docket No. 93-61

Dear Mr. Caton:

This is to notify you, pursuant to Section 1.1206(a) of the Commission's Rules that Sean A. Stokes and Jeffrey L. Sheldon, representing the Utilities Telecommunications Council (UTC), made a presentation yesterday to the staff of Commissioner Chong on the proposal in PR Docket No. 93-61 to allocate spectrum in the 902-928 MHz band for automatic vehicle monitoring (AVM) systems. UTC pointed out the millions of devices and hundreds of millions of dollars of current and projected investment in automatic meter reading and related systems which have been installed by electric, gas and water utilities.

UTC furnished the preliminary results of a survey on the amount of current and projected investment in the 902-928 MHz band that would be placed in jeopardy if the Commission allocates this spectrum for AVM services. A copy of UTC's preliminary survey results are appended to this filing.

Pursuant to Section 1.1206(a), an original and one copy of this notification are being filed for inclusion in the docket.

Should any questions arise in connection with this matter, please let me know.

Very truly yours,

Jeffrey L. Sheldon
General Counsel

Attachment
cc: Jane E. Mago, FCC

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Summary Of UTC's Position In PE Docket No. 93-61

I. General UTC Position

The Utilities Telecommunications Council (UTC) opposes an allocation of the 902-928 MHz band for automatic vehicle monitoring (AVM). Such an allocation could have a devastating impact on Part 15 operations in the band, including utility automatic meter reading and distribution automation systems.

Having induced manufacturers, core industries and consumers to spend hundreds of millions of dollars on unlicensed devices, the FCC should not now abandon the Part 15 community.

II. There is Significant Utility Use of the 902-928 MHz Band

- o The attached survey of 36 utilities indicates that collectively these utilities alone have already invested \$179 million in automatic meter reading and other equipment in this band.
- o The 36 surveyed utilities forecast a total investment approaching \$773 million in the 902-928 MHz band.
- o The responding utilities only represent a fraction of the utilities nationwide implementing AMR in this band.

The continued use of Part 15 devices is integral to the advancement of major policy initiatives of the Administration in the areas of energy conservation and management, health care, pollution control, and improved industrial productivity.

III. AVM Proponents Should Engage in Interference Testing

In addition to determining whether there is a need for AVM service in this band, proponents of AVM should engage in cooperative testing to determine the interference potential between Part 15 devices operating in the band and wide-band AVM systems.

- o UTC supports the testing procedures outlined by the Telecommunications Industry Association.
- o If the potential for interference between AVM and Part 15 devices is established through testing the FCC should not allocate the 902-928 MHz band to AVM on any basis that provides it with superior interference rights to those of Part 15 devices.
- o Given the non-interference requirements of Part 15 operation, an allocation of the 902-928 MHz band to AVM without scientific assessment of the interference potential would indicate a conscious decision on the part of the FCC to sacrifice the continued use of this band by Part 15 services.

16-June-94

UTC Survey Data On Utility Use of 902-928 MHz Band For AMR And Other Systems

Name of Utility	Number of Customers	Future Customers	Current Investment	Forecasted Investment
Arizona Public Service	N/A	350,000	N/A	\$23 Million
Atlanta Gas Light	430,000	470,000	\$30 Million	\$35 Million
Baltimore Gas & Electric	N/A	500,000	\$.5 Million	\$27 Million
Bay State Gas Company	100,000	N/A	N/A	N/A
Berkshire Gas	203	33,300	N/A	\$3.6 Million
Boston Gas	285,000	N/A	\$20 Million	\$30 Million
Brooklyn Union Gas	190,000	248,000	\$8 Million	\$13 Million
Citizens Gas & Coke Utility	1,000	50,000	\$.3 Million	\$4 Million
Columbia Gas Distribution	600	500,000	\$.3 Million	\$15 Million
Commonwealth Gas Co.	100,000	450,000	\$6 Million	\$33 Million
Connecticut Natural Gas	N/A	145,000	N/A	\$12 Million
Consolidated Edison	1,500	50,000	\$.6 Million	\$5 Million
Consumers Power	N/A	1,800,000	N/A	\$90 Million
Florida Power Corp.	2,000	7,000	\$.1 Million	\$1 Million
Greystone Power Corp	N/A	N/A	\$.1 Million	\$5 Million
Iowa-Illinois	N/A	N/A	\$.4 Million	\$.6 Million
Kentucky Utilities	N/A	150,000	N/A	\$15 Million
Long Island Lighting	N/A	1,000,000	\$.5 Million	\$5 Million
Midwest Power	1,300	762,000	\$1.5 Million	N/A
Minnegasco	378,000	490,000	\$21 Million	\$30 Million

Montana Dakota	250	40,000	\$.1 Million	\$4.5 Million
Northeast Utilities	30,000	1,500,000	\$4 Million	\$100 Million
Oklahoma Natural Gas	N/A	100,000	N/A	\$2.5 Million
Peoples Gas Light and Coke	80,000	770,000	\$6 Million	\$54 Million
Peoples Natural Gas Company	70,000	N/A	\$4 Million	N/A
Philadelphia Gas Works	35,000	500,000	\$1.5 Million	\$27 Million
Potomac Electric Power Co.	N/A	N/A	\$.3 Million	N/A
Providence Gas	1,000	160,000	\$.2 Million	\$12 Million
Public Service Colorado	N/A	1,000,000	N/A	\$30 Million
Sacramento Municipal District	N/A	100,000	N/A	\$5 Million
Southern California Edison	8,000	35,000	\$40 Million	\$110 Million
Southern California Gas	2,000	80,000	N/A	\$5 Million
Southern Company	55,000	60,000	\$6.6 Million	\$7.5 Million
Texas Utilities	N/A	2,500,000	N/A	\$50 Million
Washington Gas Light	190,000	210,000	\$14 Million	\$15 Million
Yankee Gas Services	184,000	186,000	\$13 Million	\$14 Million
Totals	2,144,853	13,066,300	\$179 Million	\$773 Million

This information has been compiled from the American Gas Association and an independent survey by the Utilities Telecommunications Council. These figures do not represent all existing or projected utility use of 902-928 MHz band.

Explanation of columns: "Number of Customers" indicates current number of utility customers or end units served by the system; "Future Customers" indicates number of existing utility customers or end units that the utility intends to ultimately serve with the system; and "Forecasted Investment" indicates total forecasted utility investment in unlicensed AMR and other 902-928 MHz equipment.