



I. Introduction

AASHTO is the national association of the state departments of highways and transportation in the 50 states, the District of Columbia and Puerto Rico. Its scope includes all five principle transportation modes, and its major purpose is to foster the development operation and maintenance of integrated national transportation system.

AASHTO, hereby submits these comments in support of the Petition for Reconsideration filed in the above-captioned proceeding on May 25, 1994, by the Public Safety Microwave Committee, the Association of Public-Safety Communications Officials, Inc., the County of Los Angeles, and the Forestry-Conservation Communications Association.

On April 15, 1992, AASHTO, through its Special Committee on Communications filed comments to the Commissions Notice of Proposed Rule Making, ET Docket No. 92-9. These comments emphasized the importance of governmental agencies and the potential difficulties of the relocation of existing systems to other spectrum bands.

AASHTO, further commended the Commission on their proposal to exempt state and local government 2 GHz fixed microwave facilities from any mandatory transition periods as noted in paragraph 25 of the NPRM.

On September 20, 1993, AASHTO filed a Petition for Clarification and/or Reconsideration of the Third Report and Order and Memorandum Opinion and Order (R&O) in ET Docket 92-9, Federal Communications Commission (FCC) 93-351, released August 13, 1993. This petition demonstrated the importance of a safe, efficient, national transportation system and its value to commercial and private interest. The use of communications technology in the operation, construction and maintenance of the national transportation system was emphasized.

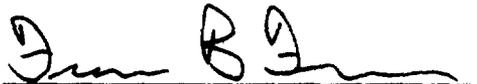
On September 29, 1993, the Public Safety Communications Council filed a "Petition for Clarification or Reconsideration of the Third Report and Order and Memorandum Opinion and Order" in ET Docket 92-9. In that petition, the PSCC requested that all public safety radio systems be exempt from involuntary relocation.

On May 25, 1994, the Public Safety Microwave Committee (PSMC), the Association of Public-Safety Communications Officials-International, Inc. (APCO), the County of Los Angeles and the Forestry-Conservation Communications Association (FCCA), collectively referred to as "Petitioners", filed a Petition for Reconsideration of the Commission's Memorandum Opinion and Order (released March 31, 1994).

II. Conclusion

AASHTO agrees with the position of the "petitioners" with respect to ET Docket No. 92-9 and supports their Petition for Reconsideration of the Commission's Memorandum Opinion and Order and respectfully requests that the Commission consider and act favorably upon these comments as it proceeds with this important undertaking.

Respectfully submitted,  
American Association of State  
Highway and Transportation  
Officials, Special Committee on  
Communications

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