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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

February 21, 1995

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

DOCKET FILE COPY ORIGINAL

Ex Parte

Re: PR Docket No. 92-235

Dear Mr. Caton:

Pursuant to Section 1.1206 of the Commission's Rules, this is to notify you that representatives of UTC met on the afternoon of February 16 with representatives of the Wireless Telecommunications Bureau, the Office of Plans and Policy, and the International Bureau to discuss UTC's position on private land mobile refarming. Representing UTC were Carl Greenway, of Kansas City Power and Light, and Jeffrey Sheldon, UTC General Counsel.

UTC described the many ways in which electric, gas and water utilities and natural gas pipelines use private land mobile radio systems, and why these public service entities cannot risk placing all of their critical communications on commercial systems. In the event of a storm or other natural disaster, a public service utility must be able to maintain constant communications with field personnel responsible for service restoration, and cannot be expected to vie for channel occupancy with other users on a commercial system. Moreover, because of the safety and liability issues involved in the provision of public utility service, field crews must have a reliable means of communication across the entire utility service area. UTC provided a written outline of these points, a copy of which is attached for filing in this docket.

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Mr. William F. Caton  
February 21, 1995  
Page Two

UTC reaffirmed its support for the industry consensus position on land mobile refarming, as described in the January 13, 1995 submission of UTC and the other major user groups. UTC also summarized some of the key points raised in its earlier Comments and Reply Comments in this docket; including: (1) the need for a graceful migration plan that can be implemented through normal equipment replacement cycles; (2) the relative unimportance of an "exclusive use overlay" process due to the de facto exclusivity provided by the frequency coordination process; and (3) issues that would be involved in consolidating radio services.

Pursuant to Section 1.1206, two copies of this notification are being filed for inclusion in the docket.

If there are any questions concerning this matter, please let me know.

Very truly yours,



Jeffrey L. Sheldon  
General Counsel

Attachment

cc (w/o attachment):  
Kathryn Hosford, WTB  
Jay Markley, WTB  
Robert McNamara, WTB  
Herbert Zeiler, WTB  
Ira Keltz, WTB  
Deborah Behlin, WTB  
Greg Rosston, OPP  
Marcus Wolf, IB

# **TYPICAL ELECTRICAL UTILITY STRUCTURE OF OPERATIONS**

**GENERATION OF ELECTRICAL ENERGY**

**TRANSMISSION OF ELECTRICAL ENERGY**

**DISTRIBUTION OF ELECTRICAL ENERGY**

**MAY HAVE A NATURAL GAS SUBSIDIARY**

# **TYPICAL RURAL ELECTRIC COOPERATIVE STRUCTURE OF OPERATION**

**GENERATION & TRANSMISSION**

**DISTRIBUTION**

**NOT USUALLY ALL THREE FUNCTIONS**

## **WHAT FREQUENCIES DO ELECTRICAL UTILITIES USE?**

**HF**

**VHF (LOW BAND) 30-50 MHZ**

**VHF (HIGH BAND) 150-170 MHZ**

**UHF 450-470 MHZ**

**800 MHZ**

**902-928 MHZ (UNLICENSED)**

**928-952 MHZ (MULTIPLE ADDRESS SYSTEMS)**

**960 MHZ (POINT-TO-POINT)**

**2 GHZ, 6 GHZ, 12 GHZ MICROWAVE**

# **WHY DO UTILITIES THINK THEY NEED PRIVATE SYSTEMS?**

## **PAST HISTORY**

**NORTHEAST BLACKOUT**

**HINSDALE FIRE**

**TELEPHONE CENTRAL OFFICE OUTAGES**

**SOFTWARE PROBLEMS TYING UP NETWORKS**

**SAN FRANCISCO EARTHQUAKE**

## **CUMULATIVE EXPERIENCE**

**BELL OPERATING COMPANIES**

**SMRs**

**AT&T**

**CELLULAR TELEPHONE COMPANIES**

**CABLE CUTS**

**NATURAL DISASTERS**

## **WHAT DO WE USE OUR PRIVATE SYSTEMS FOR?**

**BLACK START EMERGENCIES**

**LOCOMOTIVE CONTROL**

**CRANE CONTROL**

**CABLE PULLING**

**TRANSMISSION LINE CONSTRUCTION**

**POWER PLANT OPERATION & MAINTENANCE**

**CIRCUIT SWITCHING**

**CONNECTS/DISCONNECTS**

**CREW COORDINATION**

**NUCLEAR PLANT SECURITY**

**EMERGENCY RESTORATION OF POWER**

**RETRIEVING DATA FROM SUB-STATIONS**

**DATA FROM VEHICLES**

**AUTOMATED METER READING**

**AUTOMATED VEHICLE LOCATION**

**SYSTEM CONTROL**

**POWER FACTOR CORRECTION**

**RECOVERY FROM NATURAL DISASTERS**

**WITHOUT TWO-WAY MOBILE RADIO, PRODUCTIVITY FOR AN ELECTRICAL UTILITY  
WOULD DROP BY 50-80%!!!!!!!**

**THERE IS A CONSTANT GROWING NEED FOR MORE CHANNELS!**

**RECOVERY FROM NATURAL DISASTERS  
MUTUAL AID CONCEPT**

**EARTHQUAKES  
HURRICANES  
TORNADOS  
FLOODS  
WALL WINDS  
ICE STORMS  
HIGH WINDS  
ELECTRICAL STORMS**

## **SUMMARY OF COMMENTS**

**UTC SUPPORTS THE INDUSTRY CONSENSUS PLAN FOR CHANNELIZATION AND TRANSITION TIMING**

**POWER/HEIGHT LIMITS**

**INNOVATIVE SHARED USE OF CHANNELS**

**TRUNKING**

**PUBLIC SERVICE MUTUAL AID CHANNELS**

**SHARED USE OF RADIO CHANNELS**

**ANTENNA FARMS**

**EXCLUSIVE USE OVERLAY**

**VERTICAL LOADING**

**CONSOLIDATION OF SERVICE POOLS**

**FREQUENCY COORDINATION**