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WRITER'S NUMBER
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June 15, 1995

VIA HAND DELIVERY

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

DOCKET # 94-31 COPY ORIGINAL

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JUN 15 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Re: IC Docket No. 94-31

Dear Mr. Caton:

On behalf of Globe Wireless, we are filing an original and seven (7) copies of its Reply in Support of Comments Filed by Mobile Marine Radio, Inc. Relating to Agenda for 1997 World Radiocommunications Conference in the above-referenced docket.

If there are any questions, please communicate with the undersigned counsel.

Respectfully submitted,

FLETCHER, HEALD & HILDRETH, P.L.C.

Leonard Robert Raish
Leonard Robert Raish

Counsel for Globe Wireless

LRR:cej
Enclosures

cc: See Certificate of Service List

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ORIGINAL

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

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JUN 15 1995

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY**

In the Matter of)
)
Preparation for International)
Telecommunication Union World) IC Docket No 94-31
Radiocommunication Conferences)

To: The Commission

**REPLY IN SUPPORT OF
COMMENTS FILED BY MOBILE MARINE RADIO, INC.
RELATING TO AGENDA FOR 1997 WORLD
RADIOCOMMUNICATIONS CONFERENCE**

On June 2, 1995, Mobile Marine Radio Inc (MMR) filed late Comments in the above-cited proceeding arising out of Commission's Further Notice of Proposed Rulemaking in PR Docket No. 92-257 that proposes "Amendment of the Commission's Rules Concerning Maritime Communications." Through its attorney, in the Comments below, Globe Wireless supports the Comments by MMR. Globe Wireless also concurs with the view stated by MMR that consideration of 1997 WRC agenda items set forth in the latter's pleading "is essential in order to correlate the Commission's regulatory policies and provisions with the international Radio Regulations."

I. GENERAL

Globe Wireless is a California Corporation with its headquarters located in Half Moon Bay, California. It operates a worldwide network of High Frequency (HF) telecommunications services in support of the maritime industry. These services are provided by Globe Wireless HF

Coast stations at New Orleans, San Francisco, Hawaii, and Newfoundland, Canada, and pursuant to special arrangements, by HF Coast stations in other countries. Through its facilities and the use of most modern technologies HF data, facsimile, and electronics mail services are provided to ships at sea on a global basis

The ability to apply these technologies requires cooperation with telecommunications regulatory authorities throughout the world. For this reason, provisions of the ITU Radio Regulations are significant and relevant

II. PARALLEL FILING MADE BY GLOBE WIRELESS IN LETTER TO CHIEF, INTERNATIONAL BUREAU

By letter dated June 6, 1995 (copy attached hereto as Appendix A), Globe Wireless requested the Chief of the FCC International Bureau to consider a U.S. proposal that the WRC-97 agenda be expanded to include several additional Articles of Chapter XI of the ITU Radio Regulations rather than just Article 61 as now proposed. Chapter XI deals with the "Maritime Mobile Service and Maritime Mobile-Satellite Service "

Globe Wireless notes that MMR in its Comments raises in a more general way most of the same issues as set forth in Appendix A hereto. The difference is that Globe Wireless identified several specific examples of changes that should be made to the ITU Radio Regulations. However, Globe Wireless concurs completely with MMR in urging the Commission to "support inclusion in the recommended agenda for the 1997 WRC of an item or items dealing with modernization of HF Maritime communications standards"

III. THERE IS STILL TIME TO MAKE PROPOSALS FOR CONSIDERATION AT WRC-95

Pursuant to the ITU's new four year planing cycle for WRCs, it is noted that WARC-93 has already developed a preliminary agenda for WRC-97 that includes some maritime items. However, it is further noted that WRC-95 is to review the WRC-97 preliminary agenda, identify any additional items that should be included in that agenda, and recommend a final agenda to the ITU Administrative Council for its approval

It is recognized that preparation for U S proposals for WRC-95 are nearing completion and are to be forwarded to the ITU shortly. However, the preparatory process for WRC-95 is certain to continue up until the time the U S Delegation departs for the Conference. During this time there is no reason not to work on additional U S proposals that would be introduced at the Conference. As a matter of fact, the Commission's action in releasing its Further Notice of Proposed Rulemaking carries an implication or even invites that this course of action should be taken.

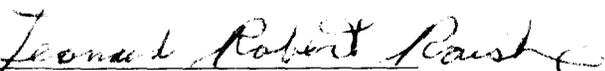
Formulating a U S proposal to expand the WRC-97 agenda along the lines suggested by MMR and Globe Wireless in their respective filings is not envisaged as a major task.

IV. CONCLUSION

The Commission is urged to proceed with a U.S. proposal to expand the WRC-97 agenda to include additional maritime items along the lines proposed by MMR in its Comments cited above and by Globe Wireless as set forth in Appendix A hereto.

Respectfully submitted,

GLOBE WIRELESS

By: 
Leonard Robert Raish

Its Attorney

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June 15, 1995

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 (703) 812-

0480

June 6, 1995

VIA HAND DELIVERY

Mr. Scott Blake Harris
 Chief, International Bureau
 Federal Communications Commission
 2000 M Street, N.W. - Room 830
 Washington, D.C. 20554

Dear Mr. Harris:

The purpose of this letter is to request on behalf of Globe Wireless that the United States propose expansion of Agenda Item 3.6 of the WRC-97 agenda to include several additional Articles of Chapter XI of the ITU Radio Regulations rather than just Article 61.

Globe Wireless is a California Corporation with its headquarters located in Half Moon Bay, California. It operates a worldwide network of High Frequency (HF) telecommunications services in support of the maritime industry. These services are provided by Globe Wireless HF Coast stations at New Orleans, San Francisco, Hawaii, and Newfoundland, Canada, and pursuant to special arrangements, by HF Coast stations in other countries. Through its facilities and the use of most modern technologies HF data, facsimile, and electronics mail services are provided to ships on a global basis.

The ability to apply these technologies requires cooperation with telecommunications regulatory authorities throughout the world. For this reason, provisions of the ITU Radio Regulations are significant and relevant.

Chapter XI deals with the "Maritime Mobile Service and Maritime Mobile-Satellite Service." Some of its provisions can be traced all the way back to the 1974 Maritime WARC. There is clearly a need to update several (but not all) of the Articles included in Chapter XI. For example, paragraphs 4204 and 4206 of Chapter XI designates frequencies for "Ship stations, AIA Morse Telegraphy, calling" and "Ship stations AIA Morse Telegraphy, working." The fact is that manual Morse code is rapidly disappearing and, further, it is understood the U.S. Coast

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Guard no longer stands guard on Morse code circuits. While not perhaps closing out manual Morse code usage entirely, logic dictates many of these underutilized frequencies would be more economically viable if used with modern technology.

This proposal does not address the entirety of Chapter XI. Provisions in Chapter XI dealing with Maritime Mobile-Satellite services would not be affected. Nor would provisions dealing with such matters as ships personnel, authority of the Master, operator's certificates, all of which are a substantial part of Chapter XI, be affected this proposal.

Following are specific proposals broken into two categories, viz,

I. Spectrum related issues

ITEM A: RR60-6, PARA 4200, 4323BH and 4209.

- Reduce the channel separations to 3 KHz
- Channelize
- Expand the band with spectrum transferred from 4202 (CW)
- Split the resultant 4209 bands into simplex and duplex sections, i.e.,
Permit coast stations to use the simplex part of the bands.

ITEM B: Para 4202 & 4207

- Convert a portion of 4202 and 4207 to simplex operation, i.e., Permit coast stations on part of 4202 and ship stations on part of 4207.
- Eliminate the speed restriction.

ITEM C: Para 4202

- Reduce the AIA calling channels to the current channels 3 and 4 only. Convert channels 1 and 2 to simplex NBDP channels.
- Convert channels 5 to 10 to a wideband simplex data channel.

ITEM D: Para 4206

- Reduce CW working on 4 and 6 MHz to 3 KHz each.
- Reduce 8 MHz to 9 KHz in the lower band

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- Eliminate the 8 MHz higher band.
- Reduce 12 and 16 MHz to 12 KHz each.
- Reduce 22 MHz to 6 KHz.
- Eliminate the 26 MHz band.
- Convert the freed-up spectrum to simplex wideband data channels.

II. Rules Issues

- Remove the data restriction on ITU voice channels, simplex and duplex. This will permit the use of facsimile and electronic mail on voice channels. It is, in any case, already a reality. Alternatively, permit data on a selected number of channels.
- Review and revise all rules and regulations contained in Chapter XI and pertaining to maritime HF which restrict the use of new technologies as long as the general principles of bandwidth allocation and non interference are respected.
- The updating of Chapter XI as proposed above will bring the Radio Regulations into line with new technologies of the 1990's. Greater spectrum efficiency without any increase in spectrum allocation to the Maritime Mobile Service will be a beneficial result.

The proposed re-allocation of the frequencies within the existing marine bands will provide more spectrum for use by the new and highly efficient modern telecommunications technologies. This will ensure the commercial viability of a HF marine communications service and enhance thereby not only commercial communications but safety communications as well. Experience confirms that a good safety communications service is not possible in isolation from a commercially viable service.

Essentially the foregoing would add Articles 59, 60, 62, 63, and 64 for consideration at WRC-97 to Article 61 that is already on the agenda. Time constraints does not permit outlining more specific and detailed changes but, in any event this would be done in the preparatory process for WRC-97.

Finally, it is reiterated addition of Chapter XI (specifically Articles 59 through 64) would not create a significant extra burden on WRC-95 as changes to the International Table of Frequency Allocations contained in Article 8 of the Radio Regulations would not be involved. As in other telecommunications services, changes to bring new technologies to the maritime services are and have been taking place. WRC-97 would permit a belated but still timely update of Chapter XI without undue burdens to the U.S. Delegation to WRC-95. Informal information

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from within the maritime telecommunications industry indicates Norway, New Zealand, and Canada would be supportive of a U.S. proposal to include Chapter XI, Articles 59-64 in the work to be done at WRC-97

On behalf of Globe Wireless you are urged to accord favorable consideration to the foregoing.

Respectfully submitted,



Leonard R. Raish

LRR:cej

cc: Mr. William Luther
Mr. Damon Ladson
Ms. Audrey Allison
Mr. Thomas Walsh

CERTIFICATE OF SERVICE

I, Chellestine Johnson, a secretary in the law firm of Fletcher, Heald & Hildreth, P.L.C., do hereby certify that copies of the foregoing "Reply in Support of Comments Filed by Mobile Marine Radio, Inc. Relating to Agenda For 1997 World Radiocommunications Conference" were sent this 15th day of June, 1995, by hand delivery and first-class United States mail, postage prepaid, to:

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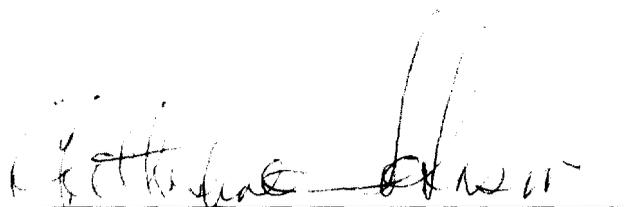
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