

Before the  
Federal Communications Commission  
Washington, D.C. 20554

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SEP 27 1995  
FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of Part 90 of the )  
Commission's Rules To Provide )  
for the Use of the 220-222 MHz )  
Band by the Private Land Mobile )  
Radio Service )  
 )  
Implementation of Sections 3(n) )  
and 332 of the Communications Act )  
 )  
Regulatory Treatment of Mobile )  
Services )

PR Docket No. 89-552

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GN Docket No. 93-252

**REPLY COMMENTS OF SECURICOR RADIOCOMS LTD.**

Securicor Radiocom Ltd. ("Securicor"), by its counsel and pursuant to Section 1.415 of the Commission's Rules, 47 C.F.R. §1.415, hereby submits its Reply Comments on the Fourth Notice of Proposed Rulemaking, FCC 95-381 (August 29, 1995) ("Fourth Notice") in the above-captioned proceeding. In its Fourth Notice, the FCC proposed to adopt Rules that would provide existing licensees in the 220-222 MHz Band a limited opportunity to modify their authorizations by relocating their transmitter sites, provided that such relocation did not alter the licensee's existing 38 dBuV/m service contour.

Securicor manufactures and distributes the highly spectrally-efficient 5 kHz linear modulation, or "LM," equipment in the 220-222 MHz Band. The 5 kHz LM systems currently being deployed in the 220 MHz band represent the current state-of-the-art in spectrally-efficient technology. To Securicor's best knowledge, there are no systems currently in commercial deployment in private land mobile usage anywhere in the world

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that provide a greater level of spectrum efficiency.

The 5 kHz Securicor LM system can carry analog speech, digital "plain" or encrypted speech and text, maps, black and white or color pictures and even slow-scan video. The LM data rate in a 5 kHz channel is currently offered at 14.4 kb/s with performance equalling that of a toll quality telephone circuit. In addition, Securicor intends to offer by year's end 5 kHz LM systems in the U.S. with a data rate of 19.2 kb/s.

Securicor commends the FCC for its recognition of the importance of enabling the 220 MHz band licensees to modify their licenses expeditiously to address site problems that have been identified or have developed over the past four years. As reflected by the Comments submitted in response to the Fourth Notice, modest relocations by incumbent licensees have become both necessary and desirable for many reasons since the licensees' initial applications were submitted in May, 1991. These reasons include the loss of previously-available transmitter facilities due to the passage of time, the identification of sites that were unsuitable to provide service to end users and other technical, engineering and business reasons. See Comments of Incom Communications Corporation ("Incom") at 8-10; Comments of SMR Advisory Group at 3. The

The Comments received on the Fourth Notice reflect virtual unanimity that the Fourth Notice's proposal to permit minor modifications within the existing 38 dBuV/m service contours will not enable many licensees to realistically address

their existing site issues. In many cases, existing licensees that have relocated their stations pursuant to FCC Special Temporary Authority risk the loss of their licenses even though their systems are built and serving the public. See Comments of American Mobile Telecommunications Association, Inc. ("AMTA") at 3-5; Comments of Roamer One, Inc. ("Roamer One") at 3-4.

Securicor concurs that the Fourth Notice does not provide licensees in the 220-222 MHz band sufficient flexibility to realistically address their site issues. Securicor thus joins the vast majority of the Commenters in this proceeding in endorsing the proposal set forth by AMTA which would permit licensees to relocate their facilities one-half the distance over 120 km toward any co-channel licensee, up to a maximum of 35 km, or to relocate to shorter spacings than 120 km with the consent of any short-spaced licensee. We believe this solution to be equitable to all existing licensees while avoiding instances of mutual exclusivity between those licensees.

Securicor is cognizant of the FCC's concern that existing licensees not be provided the opportunity to significantly relocate their stations to encroach in markets not currently served. Roamer One (at 7-8) has shown, however, that this concern is largely theoretical.

Securicor, moreover, agrees with the Commenters that suggest that the FCC should allow the licensees to define their service contours on the basis of maximum effective radiated power and antenna height at their licensed site. See Roamer Comments

at 9; Comments of E.F. Johnson at 4. In addition, licensees should be permitted to employ directional antennas to enhance their ability to serve end users in a cost effective manner.

For these reasons, Securicor respectfully urges the FCC to adopt a Report and Order in this proceeding consistent with the modifications suggested herein.

**Respectfully submitted,**

**SECURICOR RADIOCOMS LIMITED**

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September 27, 1995

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing Reply Comments of Securicor Radiocom, Ltd. was this 27th day of September, 1995, served by hand or by United States mail, first class postage prepaid, on the following:

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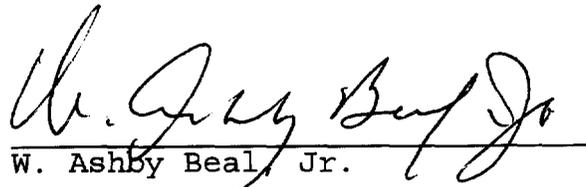
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