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The Secretary
Federal Communications Commission
1919 M Street N.W.
Washington, DC 20554

This letter is in response to the Federal Communication Commission's invitation in Paragraph 52 of its Report and Order in PR Docket 92-235 whereby the Commission invites comments and user input concerning the consolidation of Private Land Mobile Radio Services and frequency coordinators.

The current system of separate service allocations, pooling and frequency coordination by user-representative frequency coordinators should be retained because it has worked and continues to work well. The system accommodates the requirements of the users, is simple, straightforward and is economical to administer. Most importantly, the present system of allocations and services protects and upholds the specialized communications requirements of the various Private Land Mobile Radio spectrum users and guarantees a reliable source of frequencies.

Today's representative frequency coordination has its roots in the Commission's belief that frequency coordinators who are knowledgeable about and representative of the users they serve guarantee effective coordination and prevent discrimination among users. The system was initiated in the late 1940's and continued to develop as the Commission reallocated more spectrum and created additional radio service user-groups. The importance of the system was reinforced in 1986 when the Commission in Report and Order PR Docket No. 83-737, stated "having one coordinator in a radio service will substantially simplify the coordination process and will facilitate the basic purpose of coordination, which is to maximize the quality of frequency recommendations."

Industry-specific channel allocations have been successful due in large part to many of the same reasons which dictate representative frequency coordination. A "one-size-fits-all" approach to frequency pooling and assignments would not be capable of accommodating all of the differences in the various industry groups such as forest products, railroads, manufacturing, farming and many other basic industries that are so vital to the Nation's economy and well-being. Industry-specific

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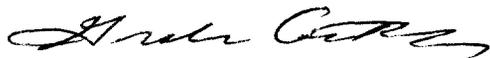
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channel allocations give frequency coordinators the control they require in order to ensure that the particular needs of the users they represent can be met with specific channel assignments.

The current system of frequency allocation and coordination has worked well for years. It has furthered the needs and interests of the various industry-specific services and has given them the control they need to ensure the efficient functioning of their businesses. The matter of Spectrum Refarming through FCC Rule changes to accommodate new technology and the development of new channels enhances the availability and functionality of Private Land Mobile Radio for America's Industries. Because of these new and more complex Rules and technical capabilities, the role of user representative frequency coordinators and availability of industry-specific channels is more important than in the past.

The current system of industry-specific frequency assignments and user-representative frequency coordinators has served the FCC and the Private Land Mobile Radio Services well for nearly 50 years and should be retained.

Very truly yours.



Graham Cottrell, Pres.
Three Rivers Logging Co., Inc.