NATIONAL ASSOCIATION OF STATE FORESTERS
444 North Capitol Street, NW, Washington DC 20001 (202) 624-5415 FAX (202) 624-5407

RECEIVED
JAN 18 1996
FCC MAIL ROOM

January 5, 1996

EX PARTE OR LATE FILED

In the Matter of:

Replacement of Part 90 by Part 88
to Revise the Private Land Mobile Radio Services
and Modify the Policies Governing Them
and
Examination of Exclusivity and Frequency
Assignment Policies of the Private Land Mobile
Radio Services

PR Docket 92-235

DOCKET FILE COPY ORIGINAL

1996
Executive
Committee

President
Stanley F. Hamilton
Idaho

Vice President
Paul D. Frey
Louisiana

Treasurer
Marvin D. Brown
Missouri

Northeastern
Representative
Ronald G. Abraham
Ohio

Western
Representative
Larry A. Kotchman
North Dakota

Southern
Representative
James L. Sledge, Jr.
Mississippi

Immediate
Past President
William A. Farris
Iowa

Executive Director
Terri Bates

Federal Communications Commission
1919 M Street, NW
Washington, D.C. 20554

To The Commission:

This is to convey the views of the National Association of State Foresters (NASF) pertaining to the Federal Communications Commission's Further Notice of Proposed Rulemaking in the above-captioned proceeding.

The National Association of State Foresters (NASF) represents the directors of the state forestry agencies from the fifty states, territories and District of Columbia. State Forester responsibilities include the protection and management of over seventy percent of the nation's forests. State Forestry personnel are the first emergency response for forest fire suppression and they are also highly involved in responding to other natural disasters. Forestry conservation radio communications systems that are well designed, interference free, available and coordinated are essential need to fulfilling their mission in the protection of life and property. The majority of Forestry Conservation systems are inter-tied with local police and fire radio systems providing for maximum efficiency during emergencies.

NASF strongly supports the position of the Forestry Conservation Communication Association which is being separately submitted and urges that the existing Public Safety Radio Services remain separate for now and that any proposal to consolidate be delayed until the Public Safety Wireless Advisory Committee ("PSWAC") findings are completed. NASF believes consolidation at this point is premature and would likely create serious radio interference problems if the FCC forced this complicated issue. In addition, the PSWAC findings may be counter to consolidation making a decision to pool channels a poor one.

Should the FCC nevertheless proceed with service consolidation, NASF recommends keeping the current Part 90, Subpart B, Public Safety Radio Services within the same service pool. NASF strongly opposes the consolidation plan proposed by UTC, which would separate the Forestry Conservation Radio Service from the Police, Fire, and Emergency Medical Radio Services. The principal use of Forestry Conservation Radio service channels is for fire fighting and basic law enforcement activities on public lands. The users of those channels are firefighters, forest rangers, game wardens and others who have

No. of Copies rec'd 0
List ABCDE

direct responsibility for the protection of life and property. They should not be given "second class" status in any service consolidation that may occur.

The existing frequency coordination system through the Forestry Conservation Communications Association (FCCA), has worked well for 30 years, and is supported by the Public Safety Communications Council ("PSCC"). The FCCA has been very effective in solving interference problems at the coordinator level. Interservice sharing problems have largely been solved in the PSCC. NASF is extremely concerned with changing frequency coordination in forestry-conservation by mandate without going through a comprehensive and facilitated process .

Good radio systems require radio channels that have been skillfully coordinated. NASF believes that coordinations made from a pool without regard to wide-area application, by coordinators operating without common standards and unfamiliar with forestry conservation, and by an organization born out of forced consolidation are a recipe for trouble. Finally, NASF is an advocate for good radio channel coordinations that better serve our men and women serving on the ground in our forests and natural resource areas.

NASF is deeply concerned that the FCC persists in pressing for consolidation in spite of requests by public safety associations and the PSCC to delay. Forced consolidation at this time when resources are extremely constrained ensures unnecessary problems and complications.

For the reasons stated above, NASF opposes radio service consolidation at this time.

Sincerely,

Stan Hamilton

Stanley F. Hamilton, Idaho State Forester
President, National Association of
State Foresters