

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of)
)
Amendment of the Commission's)
Rules to Establish Part 27, the)
Wireless Communications Service)
(WCS))

GN Docket No. 96-228

To: The Commission

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REPLY COMMENTS
OF
PETROLEUM COMMUNICATIONS, INC.

Petroleum Communications, Inc. ("PetroCom"), by its attorneys, pursuant to Section 1.415 of the Rules and Regulations of the Federal Communications Commission ("Commission or "FCC") respectfully submits these Reply Comments in response to the Comments filed with the FCC regarding the Notice of Proposed Rule Making ("Notice")^{1/} adopted by the Commission in the above-styled proceeding on November 8, 1996.

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^{1/} 61 Fed. Reg. 59048 (November 20, 1996).

I. BACKGROUND

1. PetroCom is the Frequency Block A licensee of Cellular Radiotelephone Service station KNKA 411, whose authorized Cellular Geographic Service Area ("CGSA") lies within the Gulf of Mexico Service Area. For many working in the Gulf of Mexico, such as individuals engaged in operations on drilling rigs and production platforms, PetroCom's cellular system constitutes a vital link to their families and onshore suppliers. Although PetroCom's cellular system provides a voice link for workers to the onshore world, the cellular system does not satisfy the data requirements of the oil and gas industries in the Gulf of Mexico. As PetroCom explained in its Comments filed in this proceeding, PetroCom would like to utilize a wireless local loop ("WLL") system to provide high-speed dial-up and standard telephone features, such as dual tone multifrequency transparency. Provision of WLL service in the Gulf of Mexico would promote the public interest by affording persons who live and work on remote rigs and platforms with access to high-speed data communications, such as wide area networks, Internet access, and facsimile service.

II. REPLY COMMENTS

2. There is currently insufficient spectrum available to facilitate the deployment of a WLL system in the Gulf of Mexico. The Commission should formulate its WCS rules in order to realistically permit a WCS licensee to construct a WLL in their service areas.

3. The Commission received over fifty sets of Comments in response to its Notice; participants include DARS applicants; licensees of fixed and mobile services; equipment manufacturers; and organizations representing a variety of commercial, private, and public safety users. Most entities supported use of the WCS spectrum for the development of innovative wireless services,^{2/} and several specifically mentioned WLL service.^{3/} For example, DSC

^{2/} AT&T Wireless Services, Inc. ("AT&T") at 3; Bell Communications Research, Inc. ("Bellcore") at 1; BellSouth Corporation ("BellSouth") at 3; Cellular Telecommunication Industry Association ("CTIA") at 8; DSC Communications Corporation ("DSC") at 2; Guam Telephone Authority ("GTA") at 2; Interactive Service Association at 2; Lucent Technologies, Inc. ("Lucent") at 5; Markle Foundation at 2; Omnipoint Corporation ("Omnipoint") at 1; PACS Providers Forum ("PPF") at 3; Pocket Communications, Inc. at 2; SBC Communications, Inc. ("SBC") at 4.

^{3/} Bellcore at 1; BellSouth at 3; DSC at 2; Lucent at 5; Omnipoint at 1; PPF at 3; SBC at 4.

Communications Corporation ("DSC") recognized that there is a great demand to develop WLL service.^{4/} The FCC has been presented with a clear consensus from participants that more spectrum is needed for WLL service.

4. PetroCom agrees with Omnipoint that the Commission should "take a proactive course to promote the services that would obviously serve a national consensus and a proven need -- wireless local loop service."^{5/} The Commission itself, by requesting comment on "what size spectrum block could best support, in part or fully, the provision of fixed local loop service," also recognizes the demand for wireless high data-rate services.^{6/}

5. However, Petrocom agrees with DSC that the proposed WCS spectrum is insufficient to support a WLL system.^{7/} The need for additional spectrum to support higher data-rate wireless systems was also demonstrated in DSC's June 4, 1996 Petition for Rule Making which seeks allocation of radio spectrum for the provision of wireless fixed access

^{4/} DSC at 2-3.

^{5/} Omnipoint at 2.

^{6/} Notice at ¶ 11.

^{7/} DSC at 2-3.

local loop("WFA-LL") services.^{8/} Comments filed in response to DSC's Petition for Rule Making echo the need for additional WLL spectrum.^{9/} PetroCom restates its belief that a WLL system in the Gulf of Mexico requires at least 49 MHz of spectrum for both the transmit and receive channels, with 84 MHz of separation between the transmit and receive channels. PetroCom once again urges the Commission to expand available allocations to provide sufficient spectrum for WLL services.

WHEREFORE, THE PREMISES CONSIDERED, Petroleum Communications, Inc. respectfully urges the Federal

^{8/} See *Petition for Allocation of Radio Spectrum in the 2 GHz Band for the Provisions of Wireless Fixed Access Local Loop Services*, RM-8837 (June 4, 1996) ("DSC Petition").

^{9/} See, for example, Comments of Northern Telecom, Inc. to the DSC Petition (August 12, 1996) ("Nortel Comments"); SR Telecom, Inc. at 8-9.

Communications Commission to act in a manner fully
consistent with the views expressed herein.

Respectfully submitted,

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