



Federal Communications Commission
Washington, D.C. 20554

Secretary's ofc.

JAN 02 1997

The Honorable Robert S. Walker
Member, U.S. House of Representatives
Exton Commons
Suite 595, Swedesford Road
Exton, PA 19341-2453

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

Dear Congressman Walker:

Thank you for your letter of November 25, 1996, on behalf of your constituent, C. Ward Braceland, Chairman of the Board of Supervisors, Uwchlan Township, Exton, Pennsylvania. Mr. Braceland expresses his support for the Commission's proposal to reallocate the current UHF broadcast television channels 60-69 and possibly make portion of that spectrum available for public safety use. Mr. Ward, however, expresses concern regarding the possible effect on emergency services communications as a result of another aspect of the Commission's recent proposal that establishes tentative policies for developing the initial digital television (DTV) channel allotments. Mr. Ward objects to our proposal to assign channel 21 to the television station currently licensed to Vineland, New Jersey, on channel 65, or to assign channel 18 to the television station licensed on channel 9, to Secaucus, New Jersey. Your constituent states that this may cause interference to public safety radio services in New Jersey and eastern Pennsylvania and cause economic harm due to any expense involved in changing its emergency radios to new channels.

On July 25, 1996, the Commission proposed policies for allotting channels for DTV service and also provided a draft DTV Table of Allotments. (See Sixth Further Notice of Proposed Rule Making in MM Docket No. 87-268, FCC No. 96-317, released August 14, 1996). In that action, the Commission proposed to provide all existing television broadcasters with a second 6 MHz channel for digital broadcasting. The Commission's plan for allotment of DTV channels would maintain the channels currently used for land mobile operations in a number of major markets, including channels 19 and 20 in the Philadelphia and adjacent New Jersey region. While our draft DTV Table would provide for use of channel 21 in Vineland, New Jersey and channel 18 in Secaucus, New Jersey, we believe that engineering solutions are available for avoiding interference between DTV and land mobile operations on adjacent frequencies. At the same time, we understand the potential for interference between existing land mobile services and new DTV operations in the Philadelphia/New Jersey region. Please be assured that we are carefully evaluating all available alternatives for maintaining the interests of land mobile operators as well as broadcasters as we develop the DTV Table of Allotments.

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The Honorable Robert S. Walker

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We will also include a copy of your letter in MM Docket No. 87-268. Thank you again for your interest in this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard M. Smith". The signature is written in a cursive style with a large initial "R" and a long, sweeping underline.

Richard M. Smith

Chief

Office of Engineering and Technology

ROBERT S. WALKER

16TH DISTRICT, PENNSYLVANIA

COMMITTEE ON SCIENCE
CHAIRMAN

COMMITTEE ON THE BUDGET
VICE CHAIRMAN

REPUBLICAN LEADERSHIP
CHAIRMAN

INTERNET ADDRESS:
pal6@hr.house.gov

Congress of the United States
House of Representatives
Washington, DC 20515-3816

November 25, 1996

PLEASE RESPOND TO:
2309 RAYBURN BUILDING
WASHINGTON, DC 20515-3816
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CONNIE L. THUMMA
WASHINGTON ADMINISTRATIVE ASSISTANT

LANCASTER CO. COURTHOUSE
FIFTH FLOOR
50 NORTH DUKE STREET
LANCASTER, PA 17603-9987
(717) 393-0686

EXTON COMMONS
SUITE 506, SWEDSFORD ROAD
EXTON, PA 18341-2453
(610) 363-8409
MARC T. PHILLIPS
DISTRICT ADMINISTRATIVE ASSISTANT

Mr. Reed Hundt
Chairman
Federal Communications Commission
Office of Congressional Affairs
1919 M Street, N.W.
Washington, D.C. 20554

Dear Mr. Hundt:

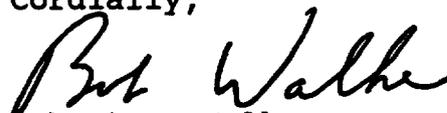
I am writing to you on behalf of my constituent, Mr. C. Ward
Braceland, Chairman of the Board of Supervisors of Uwchlan Township
in Exton, Pennsylvania, who has enlisted my assistance.

It is my understanding that Mr. Braceland is requesting that the
FCC make available a new spectrum that can help alleviate the
problems faced by Uwchlan Township and other public safety
agencies. Enclosed is a copy of a letter Mr. Braceland sent to the
FCC outlining his concerns. Accordingly, I would like to take this
opportunity to express my interest on behalf of my constituent and
to request that this matter be reviewed as expeditiously as
possible.

Thank you for your cooperation in this regard. I will look forward
to hearing from you at your earliest opportunity.

Please respond to my Exton office.

Cordially,


Robert S. Walker

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Enclosures

MMP
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Uwchlan Township

715 North Ship Road
Exton, PA 19341-1940

(610) 363-9450 FAX (610) 363-0518

Chester County, Pennsylvania

November 20, 1996

U.S. Congressmen Robert Walker
Exton Commons, Ste 595
Exton, PA 19341

Re: FCC Hearing-Advanced Television System
Docket No. 87-268

Dear Congressmen Walker:

This request is to close to Philadelphia and as a result will cause some communities a lot of problems. As you can see from our letter to the FCC, it hits our police department. The cost will be in the range of \$100,000 to \$200,000 of an unfunded mandate to the communities affected in Chester County. Included in those affected in the area, the Borough of West Chester. Our understanding is it affects all of Delaware County. This even would affect the University of Pennsylvania.

As you are trying to box up 30 years of work in Washington, we would sure appreciate if you would make a few calls to see if anything could be done to help us with the FCC. Washington is difficult for us to communicate to as a small governmental entity. Please come to our aid one more time.

Very truly yours,



C. Ward Braceland
Chairman, Board of Supervisors

Encl. copy of letter to FCC

Uwchlan Township

715 North Ship Road
Exton, PA 19341-1940

(610) 363-9450 FAX (610) 363-0518

Chester County, Pennsylvania

November 20, 1996

Secretary, FCC
1919 M. Street N.W.
Room 222
Washington, DC 20554

RE: Advance Television System and their impact upon the
Existing Television Broadcast Service

MM Docket no 87-268
Sixth Further Notice 96-317

Dear Chairman Hundt:

Uwchlan Township wishes to express its strong support for Federal Communications Commission action to reallocate the current UHF broadcast television channels 60-69, and make a portion of that spectrum available for public safety use. The first step in the process is reallocation of UHF channels 60-69 as proposed by your staff in the above referenced digital television proceeding.

There is currently an urgent need in many parts of the country for additional public safety radio channels. The Public Safety Wireless Advisory Committee (PSWAC), co-sponsored by the FCC and the NTIA, recently released its "Final Report" which found that public safety agencies need at least 2.5MHZ of additional spectrum right now for interoperability, at least 25 MHZ within five years, and additional 70 MHZ within the next fifteen years.

Uwchlan Township agrees with the PSWAC findings. In our area of the country there are no additional radio channels available for the expansion of existing systems nor for the implementation of new ones. We have seen the problems first hand with the upgrading of our county wide radio system which serves the police, fire and ambulance. Those of us as elected officials having a mandate to provide life and property protection communications services are stifled by this lack of spectrum. Only immediate FCC action in making available new spectrum can help alleviate the problems faced by Uwchlan Township and many other public safety agencies around the nation.

The spectrum within channels 60-69 is ideal for public safety use.

This block of UHF channels is adjacent to the 800 MHZ mobile radio frequencies heavily used by public safety agencies.

While we support the allocation of additional 800 MHZ spectrum for public safety, we also alert the Commission to problems with the current DTV channel planning as it affects land mobile users of the 500 MHZ shared TV channels 19 and 20 in the New Jersey and Eastern Pennsylvania area.

Uwchlan Township is currently licensed to operate public-safety radio communications on frequencies derived from the sharing of the TV channels under 47 CFR, Part 90, Subpart L, Authorization In The Bank 470-512 MHZ (UHF-TV Sharing) of the FCC Rules. One hundred fifteen radio channels in this band provide the delivery of life saving and property protection services of eight police, fire and emergency medical agencies to a population of approximately 15,000 citizens and workers located in a 10.4 square mile area of Chester County, Pennsylvania.

This 24-hour-per-day, public-safety radio system, installed at a cost of \$100,000 of taxpayers' money, is essential to preserving the health and welfare of the general public. The Commission's proposal to allow TV broadcast stations to operate on adjacent TV channels 18 and 21 frequencies in Secaucus and Vineland, New Jersey would create harmful interference to our public safety communications, thus jeopardizing our ability to deliver the life, safety and property protection services to which we are bound by state law.

We call to the attention of the Commission that the docket identifies separation of the proposed TV station from the center of the urbanized area, in this instance Philadelphia, PA as less than the technically appropriate 110 miles between the broadcast operation site and the nearest adjacent channel land mobile site. In fact, channel 18 in Seacucus, New Jersey will be less than 80 miles from center city Philadelphia. Channel 21 in Vineland would be located just a little over 32 miles from center city. However, we respectfully remind you that the allocation for use of the public safety communications channels derived from TV channels 19 and 20 extends outward in a 50 mile radius of the center of the urbanized area. Further, the Commission has granted waivers of this "50 mile rule" in support of public safety operations, further expanding the radius to as much as 60 miles. Thus the distance from the currently licensed operations and the proposed adjacent DTV channel is not the desired 110 miles, but considerably less as evidenced below.

Our radio system, which operates on channels in the TV Channel 19 {20} spectrum, will be impacted by interference from the proposed implementation of TV Channel 18 {21} in Secaucus{Vineland}, New Jersey. The geographical coordinates of this proposed DTV transmitter is 40-42-43N, 74-00-49W{39-33-07N, 74-50-29W}. Our

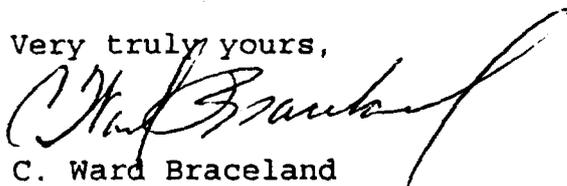
currently licensed transmitter site is located at the geographical coordinates 40-03-29N, 075-35-55W. This is a separation of only 95 miles. It is our position that such close spacing of interfering transmitters will jeopardize the delivery of services for the protection of life and property of the general public.

We also urge the Commission not to eliminate use of Channel 20 for land mobile service in the Philadelphia region. Many public-safety agencies have implemented operations on these channels at a great expenditure of public funds.

We respectfully ask you to consider the impact of this proceeding on the public-safety entities operating on TV channels 19 and 20. With no other channel availability, where in the radio spectrum would they move. Who pays for this? Is it fair and appropriate to expect the local tax base to absorb such a mandate? Did not Congress say there would be no more unfunded mandates?

On behalf of the Board of Supervisors, Uwchlan Township urges the Commission to act expeditiously and favorably in this matter.

Very truly yours,



C. Ward Braceland
Chairman

cc: U.S. Senator Arlen Specter
U.S. Senator Rick Santorum
U.S. Congressmen Curt Weldon
U.S. Congressmen Robert Walker
U.S. (elected) Congressmen Joseph Pitts
Chester County Commissioners

CWB/pm