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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Guidelines for Evaluating the Environmental ) ET Docket No. 93-62  
Effects of Radiofrequency Radiation )  
 )

**PETITION FOR PARTIAL RECONSIDERATION**

Northeast Louisiana Telephone Company, Inc. (Northeast), by its attorney and pursuant to Rule Section 1.429, hereby requests partial reconsideration of the Commission's First Memorandum Opinion and Order in ET Docket No. 93-62, Mimeo No. FCC 96-487, released December 24, 1996. Northeast is licensed to provide paging, mobile telephone and rural radio service in and around its telephone service area. Northeast applauds the Commission's decision to extend the deadline for compliance with the new radiofrequency (RF) radiation rules. However, Northeast agrees with numerous commenters in this proceeding that the Commission should establish the deadline as one year after the release of the revised OET Bulletin No. 65.

The First Memorandum Opinion and Order acknowledges that several parties have requested the Commission to extend the compliance deadline (originally scheduled for January 1, 1997) so that it will fall due one year after the release of the updated OET Bulletin No. 65. Id. at ¶ 5. An extension is necessary because the Commission's new RF radiation rules have raised a number of complex issues which have yet to be addressed. The industry will need the

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guidance to be provided by the updated Bulletin No. 65 in order to accurately evaluate their compliance with the new rules.

Much to its credit, the Commission has recognized the difficulties in achieving compliance by January 1, 1997, and its First Memorandum Opinion and Order has granted an eight month extension of this deadline. Northeast appreciates this extension, but is concerned that it may be several months before the revised OET Bulletin No. 65 will be issued (and the complex issues on reconsideration resolved). Therefore, despite the September 1, 1997 extension, the industry may nonetheless have inadequate time to comply with the new RF radiation rules. Northeast has several transmitters that will require some form of evaluation. Because Northeast is a small business, it has limited resources to spend on compliance. Therefore, it is vital that Northeast have a clear roadmap of the new RF radiation rules when performing its compliance evaluation.

The Commission's First Memorandum Opinion and Order concurs with the need for a longer transition period, but states that "we believe that it would be unnecessary, in most circumstances, to extend the transition period for a full year or more after a revised Bulletin No. 65 is issued." Id. at ¶ 8. Northeast hopes that this conclusion is a correct one, and that the release of revised Bulletin No. 65 is imminent. If the revised Bulletin does indeed answer the many complex issues raised on reconsideration, the September 1, 1997 extension may be

adequate for Northeast to evaluate its compliance. However, if the release of the Bulletin is further delayed, or this document fails to provide unambiguous guidelines for achieving compliance, small businesses such as Northeast may be unable to timely comply with the new rules. Therefore, it is respectfully requested that an extension be based on the resolution of the outstanding issues (presumably in revised Bulletin No. 65).

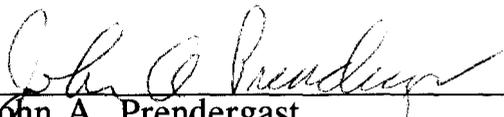
In the alternative, Northeast requests that the Commission announce its intention to take a flexible approach in further extending the September 1, 1997 deadline, or in granting requests for waiver of this deadline. In particular, the Commission should clarify that the need for a small licensee to evaluate multiple transmitters will justify a waiver, especially if the release of the Bulletin does not occur until late Spring or Summer 1997. Likewise, delays in obtaining information about other radio operations at a given antenna site should justify a waiver, if these delays are beyond the control of the entity performing the environmental compliance review. A flexible approach by the FCC would help to give licensees assurance that they will be given a fair opportunity to meet the Commission's new requirements.

**Conclusion**

In light of the foregoing, Northeast requests that the Commission reconsider its First Memorandum Opinion and Order as specified above.

Respectfully submitted,

NORTHEAST LOUISIANA TELEPHONE  
COMPANY, INC.

  
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John A. Prendergast  
Blooston, Mordkofsky, Jackson & Dickens  
2120 L Street, N.W., Suite 300  
Washington, D.C. 20037  
Phone: (202) 828-5540

Filed: January 23, 1997

**CERTIFICATE OF SERVICE**

I, Utokia Davis, do hereby certify that I have, on this 23rd day of January, 1997, caused to be served by first class U.S. mail, postage prepaid, a copy of the foregoing Petition for Partial Reconsideration to the following:

Cathleen Massey, VP  
External Affairs  
AT&T Wireless  
1150 Connecticut Avenue, N.W.  
4th Floor  
Washington, D.C. 20036

Mark Golden  
PCIA  
500 Montgomery Street  
Suite 700  
Alexandria, VA 22314-1561

Henry L. Baumann  
National Association of  
Broadcasters  
1771 N Street, N.W.  
Washington, D.C. 20036

Kathryn Marie Krause  
US West, Inc.  
1020 19th Street, NW  
Suite 700  
Washington, DC 20036

David L. Hill  
PageMart II, Inc.  
O'Connor & Hannan, L.L.P.  
1919 Pennsylvania Avenue, NW  
Suite 800  
Washington, D.C. 20006-3483

Judith St. Ledger-Roty  
Paging Network, Inc.  
Reed, Smith, Shaw & McClay  
1301 K Street, N.W.  
Suite 1100 East Tower  
Washington, D.C. 20005-3317

Michael Altschul  
CTIA  
1250 Connecticut Avenue, NW  
Suite 200  
Washington, D.C. 20036

Dennis L. Myers  
Vice President &  
General Counsel  
Ameritech Cellular  
2000 West Ameritech Center Drive  
Hoffman Estates, IL 60195-5000

  
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Utokia Davis