

BEFORE THE
FEDERAL COMMUNICATION COMMISSION
WASHINGTON, DC

FILED
FEB 7 1997
FEDERAL COMMUNICATIONS COMMISSION

In The Matter of)
INDUSTRIAL TELECOMMUNICATIONS))
ASSOCIATION, INC. - FILING))
CONCERNING A FRAMEWORK FOR))
CONSOLIDATION OF THE PRIVATE))
LAND MOBILE RADIO SERVICES))

PR DOCKET NO. 92-235

PR DOCKET NO. 92-257

COMMENTS OF
MENASHA CORPORATION

These comments are submitted in response to the Commission's Proposed Rule Making in the above captioned proceedings.

1. INTRODUCTION

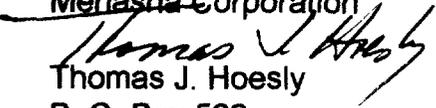
Menasha Corporation, Land and Timber Division is a industrial tree farm located in the Pacific Coast Range of Southwest Oregon. We have been a licensee of the Forest Products Radio Service since the early 1950's. The nature of our business made it mandatory to have a radio system that is reliable and clean. Communications regarding personal injury, forest fire detection and suppression, and wildlife violations are common occurrences in our day to day activity.

II COMMENTS

Having reviewed Industrial Telecommunications Association's proposed "Blueprint", I submit the following comments for the record. Menasha operates its radio base station in North Bend, Oregon with 35 mobiles unit used to cover our tree farm. Over the years , we have invested considerable funds in maintenance and upgrading equipment. This investment will be jeopardized by a two pooled system. The proposal does not give due address the priority needs of established users.

We oppose the inclusion of the 30-50 Mhz band as something that was specifically excluded in the Spectrum Refarming Docket and believe this band should remain allocated to only those currently authorized radio services. The use of our two-way radio is vital to the protection of life and property, enhances the safety of our personnel, and assists us with natural disasters, such as winter landslides.

Respectfully submitted by:
Menasha Corporation


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FEDERAL COMMUNICATIONS COMMISSION
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COMMENTS OF
FRUIT GROWERS SUPPLY COMPANY

These comments are submitted in response to the Commission's Proposed Rule Making in the above captioned proceedings.

I. INTRODUCTION

FRUIT GROWERS SUPPLY COMPANY, an agricultural affiliate of **SUNKIST GROWERS, INC.**, herein referred to as **FGS**, is presently the fourth largest private timberland owner in the State of California, and a licensee in the Forest Products Radio Service. The Northern Operations of **FGS** actively manages 372,000 acres of timberland in the northern half of California and harvests 55 to 75 million board feet annually. We have been in operation for over eighty years and have been a licensee since licensing began.

II. COMMENTS

We currently own and operate three base stations, three repeater sites and over forty mobile land units operating in the 30-50 MHz band. In 1996 we invested over \$80,000 in repair and upgrades for two of our repeater sites, including a new freestanding 120' steel tower. In 1997, we have budgeted nearly \$100,000 for the construction of an additional repeater site on our Lassen Forest properties.

FGS has made this substantial commitment because we believe that improved radio communications is vital for the protection of life and property, the safety and protection of our employees and equipment, for forest fire detection and suppression, and for efficiency of our forestry, logging and woods operations. The functionality and importance of a reliable radio system in this dangerous and high risk environment cannot be overemphasized.

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The ITA "Blueprint" recognizes the uniqueness of Railroads, Airline Terminals, Oil Spill cleanup, and Central Station Protection systems, but ignores the needs of other industry groups which have been historically recognized by the FCC as having unique communications requirements. The "Blueprint" is not representative of the desires of all Licensees of the Private Wireless Division of the FCC and presents an incomplete picture of the nature of our Forest Industry requirements.

Consolidation of radio service pools has been addressed in the Spectrum Refarming Docket 92-235. The 30-50MHz band was specifically excluded. The consolidation "Blueprint" goes well beyond the original scope of Docket 92-235 by including the 30-50MHz band, for the sake of "uniformity in regulations." The 30-50MHz band is an entirely separate issue based on the unique propagation characteristics and its suitability for the Forest Products Industry.

Interested parties, including ITA, had adequate opportunity to present comments and reply comments throughout the proceeding. ITA's presentation, at this time, serves only to re-open an old issue, in a manner apparently designed to prejudice the Commission, and again present a proposal that is contrary to a majority of other comments that have been received by the Commission.

Current radio service classifications have served our industry well for nearly 50 years in the Forest Products Radio Service and FGS relies on the expertise of FIT (Forest Industries Telecommunications) to maintain the integrity of our system through effective and professional frequency coordination. The "Blueprint" would eliminate this vital role and place us at the mercy of all other coordinators.

FRUIT GROWERS SUPPLY COMPANY opposes the inclusion of the 30-50MHz band as something that was specifically excluded in the Spectrum Refarming Docket 92-235 and believes this band should remain allocated to only those currently authorized radio services.

Respectfully submitted by:

FRUIT GROWERS SUPPLY COMPANY



Charles L. Hickman IV
Administrative Manager
Northern Operations
February 4, 1997