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

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Amendment of the Commission's) PR Docket NO. 92-257
Rules Concerning Maritime)
Communications)

To: The Commission

COMMENTS OF THE FORESTRY-CONSERVATION
COMMUNICATIONS ASSOCIATION

The Forestry-Conservation Communications Association ("FCCA"), by its attorneys, hereby submits the following comments in response to the Commission's Second Further Notice of Proposed Rulemaking in the above-captioned proceeding, FCC 97-217 (released June 26, 1997).

FCCA is the Commission's certified Part 90 frequency coordinator for the Forestry-Conservation land mobile radio channels. FCCA also represents its parent organizations, the National Association of State Foresters ("NASF") and the International Association of Fish and Wildlife Agencies ("IAFWA"), on matters related to radio communications. The members of NASF and IAFWA provide a full range of public safety related services, including fire protection, law enforcement, and emergency medical services over wide areas of state-owned and/or protected lands.

The Commission has suggested the possibility that maritime Public Coast channels in the VHF band be made available for public safety land mobile communication in land-locked areas, far from navigable waterways. This proposal is of great interest to FCCA,

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as many forestry-conservation agencies operate in such land-locked areas and already use VHF frequencies immediately adjacent to the Public Coast channels. Many of these forestry-conservation agencies need additional VHF channels, as the current VHF channels allotted for their use are already oversubscribed. Other public safety frequency bands are also either unavailable due to congestion or are inappropriate for wide area (often state-wide) systems covering forests, mountains, and other limited access areas. For example, the 800 MHz band is rarely used for forestry-conservation as it would require an enormous number of sites to cover large expanses of land and does not propagate well in areas with dense foliage.

Making Public Coast stations available for public safety use far from navigable waterways is good spectrum policy, as it would maximize use of scarce spectrum and, moreover, would promote the safety of life and property. With access to additional VHF frequencies, forestry-conservation agencies would be better equipped to prevent and suppress life-threatening forest fires, perform rescue operations in remote areas, police public lands, and protect our natural resources.

FCCA is concerned, however, that the Commission's plan to grant Public Coast channels on a multi-state geographic basis through auctions could undermine efforts to provide access to these channels for public safety. Therefore, FCCA urges that public safety agencies have an opportunity to apply for these channels first on a site-specific or state-wide basis (as is often necessary for forestry-conservation operations), before auctions are conducted. Auction winners would then need to protect public safety incumbents. Some Public Coast channels should also be excluded from auctions altogether for a specific time period, to ensure that future public safety requirements are

met. FCCA estimates that its members will need five to ten of the Public Coast channels. Three of those channels could be designated for Digital Select Calling (DSC) and made available in coastal/waterway areas to both public safety and public coast operations. The addressability of DSC could facilitate such sharing in these areas.

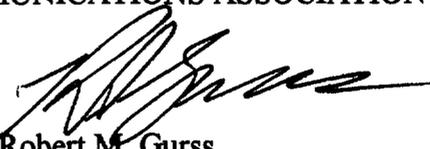
CONCLUSION

Therefore, for the reasons set forth above, FCCA urges the Commission to set aside Public Coast VHF channels for public safety operations.

Respectfully submitted,

FORESTRY CONSERVATION
COMMUNICATIONS ASSOCIATION

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