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May 28, 1998

MAY 28 1998

VIA HAND DELIVERY
Magalie Salas, Esquire
Secretary
Federal Communications Commission
1919 M Street, N.W. - Room 222
Washington, D.C. 20554

Dear Ms. Salas:

My partner, Vince Curtis, suggested that I send to you, for your own review, a copy of the comments we filed on behalf of our client, Forest Industries Telecommunications, in WT Docket 97-153, the ULS proposal.

The comments and recommendations for changes to the Commission's proposal were the result of many discussions and, frankly, even remote testings of the ULS system itself. The gist of the comments is that, while the proposal for an updated automated licensing system is desirable, the specific proposals go too far than they need to be to implement the system. For example, we do not need a 92 page application form (Form 601), 40 pages of "uniform" procedural rules, the applicant's TIN or (more importantly) his social security number, to make the system work. Certainly, electronic filing need not become mandatory by January 1, 1999. The electronic system itself needs improvement. It should be more user friendly, and more accessible from a variety of existing computer systems. It does not now meet those tests.

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Although this letter merely summarizes our client's comments, I am nevertheless sending, under separate cover, two copies, to the docket file in the proceeding.

Very truly yours,

FLETCHER, HEALD & HILDRETH, PLC

George Petrutsas
Counsel for
Forest Industries Telecommunications

GP:cej
Enclosures

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

MAY 2 1 1998

In the Matter of	)	
	)	
Biennial Regulatory Review - Amendment of Parts 0, 1, 13, 22, 24, 26, 27, 80, 87, 90, 95, 97, and 101 of the Commission's Rules to Facilitate the Development and Use of the Universal Licensing System in the Wireless Telecommunications Services	)	WT Docket No. 98-20

COMMENTS OF
FOREST INDUSTRIES TELECOMMUNICATIONS

FOREST INDUSTRIES
TELECOMMUNICATIONS

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Date: May 22, 1998

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SUMMARY

FIT supports the Commission's plan to establish a universal licensing system (ULS) for the wireless services administered by the Wireless Telecommunications Bureau. However, some of the proposals go too far and others are unrealistic. For example, the proposal to require only electronic filing as of January 1, 1999, is not reasonable. The problems that would impede small users' filing through the system must be resolved before the paper filing option is eliminated. The system must be designed to work with a wide range of hardware and software and should be accessible from widely used office networks. Similarly, the proposed forms and rule consolidation go too far and will increase, rather than reduce, the burden on many users. The plan to use the taxpayer identification number, and especially the social security number for individual applicants, raises substantial privacy issues for applicants and practical issues for coordinators, such as FIT. A better alternative is issuance of the Commission's own Licensee Identification number. Finally, coordinators must be provided free access to the Commission's license and applications database so they can discharge their frequency coordination responsibilities properly and economically.

<----------->

BEFORE THE

Federal Communications Commission

WASHINGTON, D.C. 20554

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Biennial Regulatory Review - Amendment of Parts 0, 1, 13, 22, 24, 26, 27, 80, 87, 90, 95, 97, and 101 of the Commission's Rules to Facilitate the Development and Use of the Universal Licensing System in the Wireless Telecommunications Services	)	WT Docket No. 98-20

COMMENTS OF FOREST INDUSTRIES TELECOMMUNICATIONS

Forest Industries Telecommunications ("FIT"), by counsel, hereby files its comments in response to the Commission's Notice of Proposed Rulemaking ("Notice") in the above referenced proceeding.

I. Introduction

FIT is the national organization of radio users in the forest products industry. It has represented that industry's interests in land mobile wireless communications for nearly half a century. It has also been the certified frequency coordinator for the former Forest Products Radio Service and is now one of the certified frequency coordinators for applicants for frequencies in the Industrial/Business radio pool. FIT has had extensive experience in the Commission's licensing process, with respect to licensing private land mobile wireless systems, and it is vitally interested in the Commission's proposals in this proceeding as the representative of an important industry and as an experienced frequency coordination agency.

Briefly, FIT supports the Commission's goal in the proceeding to improve and further automate its wireless licensing systems. However, FIT believes that several of the Commission's specific proposals go too far and, if fully implemented, could be counterproductive and would complicate rather than simplify the licensing process for many applicants and licensees. For example, the proposal to consolidate the application forms would bring about complex and unwieldy forms. The proposed consolidation of the licensing procedural rules in Part 1 would bring about more than forty (40) pages of rules, very few of which would apply to most applicants and licensees. Moreover, the proposed consolidation of the application forms and procedural rules, and the Commission's desire for greater uniformity, would impose new requirements on many applicants and licensees (primarily applicants for private wireless stations) for no other purpose than for uniformity. Therefore, FIT believes that a more judicious approach to consolidation of the application forms and procedural rules can accomplish the Commission's basic objectives while keeping the application forms and rules simpler and more user friendly. Finally, the proposal to require electronic filing by January 1, 1999, is unwise and would be unworkable. The option of paper filing should continue to be available to applicants well beyond that date, perhaps indefinitely. FIT's comments on the issues discussed in the Notice follow.

II. Comments

A. Electronic filing and new forms

1. Consolidation of application forms.

While some consolidation of the application forms is desirable, FIT believes that the Commission's proposal goes too far. The proposed new Form 601 is 92 pages long, including extensive instructions and many schedules. As such, it would be cumbersome to use, extremely complicated, and unwieldy, and would complicate rather than simplify licensing. The combination of numerous forms into a single, multiple purpose form would increase the paperwork and response time requirements for applicants and licensees who previously had only relatively simple forms to complete. While Form 601 is referred to in the Notice as a single form, it is, in fact, a form with many possible attachments. The instructions to Main Form 601 consist of 14 tightly printed pages and certain of the schedules are comprised of as many as 17 pages including instructions.[1] Similarly, proposed Form 605, the "Quick form Application" consists of a main form with five possible attachments and twelve pages of instructions. The goal of streamlining should be to ease application preparation; it should not be simply to reduce the number of forms as such.

The Commission notes that over a million "small entities"[2] will be affected by

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[1]Proposed Schedule I consists of five pages and twelve pages of instructions.

[2]Appendix 0 to the NPRM estimates that there are over one million licensees in the Private Land Mobile Radio Service, over 700,000 ship and aircraft station licensees, almost 100,000 Private Carrier and Common Carrier Paging licenses, the majority of which qualify as small entities, and 100 licensees in the air-ground radiotelephone service, all of which are small entities.

the proposed form changes. Although certain specific small users would be permitted to use proposed Form 605 "Quick-Form," that form is limited in purpose and still quite lengthy in comparison to the forms it would replace. Further, applicants would be tasked with reviewing nine pages of the form and schedules before deciding which sections they must complete.

The proposed consolidated forms would require many applicants and licensees to supply information not previously required of them, much of it of no decisional significance. For example, Form 601, schedule H, would require private land mobile applicants to respond to several questions concerning alien ownership, although the Communications Act does not prohibit or regulate alien ownership (other than foreign government ownership) in private land mobile wireless licenses. Therefore, questions 41-44 in the proposed Form 601 are not appropriate for private land mobile licensees. Also questions 45-48 are also unnecessary in those services.

In sum, FIT submits that a somewhat lesser consolidation of forms is appropriate. More targeted, less complex forms, properly formatted to be compatible with the proposed ULS system, would achieve the Commission's objectives while lessening the burden on applicants and licensees, particularly applicants in the private service. An acceptable array of forms would be: Proposed Form 601, somewhat abbreviated and changed, for the CMRS and, probably, for the auctionable services; Current Form 600, again abbreviated and possibly re-formatted, for the private land mobile, marine private coast, and aviation ground stations; Form 415 (which was recently adopted) for microwave, including common carrier, private,

broadcast auxiliary, and for local television transmission; and Form 605, again abbreviated and simplified, would be used for the various mobile services, including GMRS, ship, aircraft, and other such services. The existing form 610 series should be retained for the Amateurs Radio Service, although it probably would have to be formatted to be compatible with the proposed ULS. Form 405A should also be retained as the renewal application form and for reporting "minor" changes to existing facilities in the private services.

2. The Electronic filing and data retrieval system.

FIT wholeheartedly supports the Commission's plan to further implement electronic filing. Two trends intersect to force this change: the inexorable growth of radio communications, which has caused a steadily increasing flow of paper through the Commission's licensing facility in Gettysburg; and the near ubiquity of communications-capable desktop computers, which has put electronic filing within easy reach of parties that file a large number of applications. Anyone familiar with the Commission's operations understands that the days of depending exclusively on paper filing must end. But this does not mean that the Commission must make an immediate shift to exclusive electronic filing. The Commission must resolve the problems that will impede small users' filing through ULS before it eliminates the option of paper filing.

The trade-offs between paper and electronic filing are different for different classes of users. A large licensee has incentive to initiate electronic filing as soon as possible, because doing so will lower its own costs. Chances are such an entity

already has an installed base of computers with external communications capabilities, and the technical expertise to configure and operate them. Any additional expense for training personnel will soon be recouped by lower per-application costs. And, of course, the Commission benefits greatly when a large filer sends in bits instead of paper. But the cost-benefit balances are different for smaller users. The switch to electronic filing will impose costs on these users, not savings, and the transition to electronic filing must accommodate their needs.

Realistically, it will never be possible to migrate a full 100% of all users to electronic filing. Therefore, the paper filing option should continue to be available indefinitely. But adoption of the following suggestions will help the Commission move close to that level.

First, ULS should be designed to work with the greatest possible range of hardware and software. Many small businesses still have old computers in everyday commercial use, many of them still running old, DOS-based software. A ULS system that depends on state-of-the-art hardware and software will be inaccessible to those licensees. At the very least, ULS must be compatible with browsers operating under Windows 3.1 on 386-class hardware, or Apple equipment of comparable vintage.[3] If at all feasible, the Commission should also develop a text-based version accessible through generic DOS communications packages such as ProComm or Q-Modem. Of course, the system must always work with the most recently-released browsers as

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[3]Commission staff have advised that ULS does not presently operate with browser earlier than Netscape 3.0 and Microsoft Internet Explorer 3.0.

well, and everything in between.

The presently required task of downloading and installing a PPP dialer or configuring the Windows 95 dialer will be insurmountable for unsophisticated users. FIT understands and agrees in principle with the Commission's decision to enhance security by implementing ULS on a WAN rather than the Internet. Nevertheless, for the benefit of small users that cannot overcome the dialer problem, the Commission should explore the feasibility of providing secure access to the WAN via the Internet as well. Although in principle setting up access to the Internet is no easier than for a WAN, in practice an Internet customer has the advantages of pre-configured software and telephone assistance from its Internet service provider.

The Commission should also make its system accessible from the most widely-used office networks. A practice test demonstrated that at least one common network had to be bypassed with a modem bank and with a specially-installed telephone line and a computer equipped with its own modem in order to access the Commission's ULS. As Commission personnel explained it, the changes to the modem server needed to accommodate ULS would render the existing modem server useless for its other purposes.[4] Not only is a dedicated computer an expensive arrangement, as it entails hardware costs and recurring line charges beyond the outlays for the existing modem bank, but it also requires personnel to use ULS from a

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[4] Specifically, the ULS system demands communications in the TCP/IP protocol, while most other modem-based applications reject that protocol. This means it is possible to configure the modem server for ULS, or for everything else, but not both. Despite considerable effort, we were unable to identify either a hardware or software product that would permit protocol selection on a per-call basis.

central location, rather than their own desks, which creates unnecessary workplace inefficiencies. The Commission is urged to address and solve this problem. If the problem can be corrected at the licensees' premises, the Commission should disseminate whatever information is needed.

Second, ULS should make greater provision for assisting novice users. Large licensees will undoubtedly set up training programs to familiarize their personnel with the quirks of ULS. Small users will have to figure out the system on their own.

The Commission is urged to work with focus groups of users to identify sources of trouble and to test corrections. Group members should be chosen to represent a range of experience with computers and with the Commission's licensing processes, including rank novices in both categories. Other suggestions:

- The Commission should establish a "training mode" on ULS. This would permit a user to practice the entire exercise of preparing and submitting a filing, just as though it were actually requesting or modifying a license (for example), except that no official Commission action would result.

- The Commission should provide on-line tutorials for users whose software can support it. The user would specify a task — *e.g.*, renewing a license — and the tutorial would walk the user through the required steps.

- The Commission should provide context-sensitive help screens, again for users whose software can support it. The present help system requires the user to locate the needed topic manually, which itself calls for a certain minimum of knowledge. A context-sensitive help system, in contrast, identifies the user's goal from the present display and provides help on that task, often with a menu of alternatives.

- The Commission should improve its error messages. As a rule, an error message should both identify the problem as specifically as possible, and also suggest appropriate remedial action. For example, the "Invalid TIN" message could usefully remind the user to omit hyphens from the ID. The "Invalid TIN/Password" message could suggest checking the

case of the password. Focus groups of novice users would quickly help the Commission to identify error messages that need revision.[5]

- The Commission could reduce the incidence of error messages by disabling buttons that do not apply in a particular situation. For example, if an entity that has no licenses nonetheless attempts to cancel or duplicate licenses, it is informed that it has none, but is still presented with operational "Cancellation" and "Duplicate" buttons. Attempts to use these trigger a confusing error message.

- Even experienced users can lose their way in the "tree" of screens available. The Commission could simplify navigation by putting a "Return" button on every page (although we think the label "Go Back" would be less ambiguous), a "Home" or "Restart" button at least on every second page, and "Exit" buttons throughout. If the browser "back button" will produce unwanted results, which seems to happen occasionally, the user should be presented with on-screen warnings at appropriate times.[6]

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[5]In a recent test with ULS, using the Windows 95 dialer, efforts to access ULS when it is busy produced this misleading error message:

(Footnote 4 continues)

> Dial-Up Networking could not negotiate a compatible set of network protocols you specified in the Server Type settings. Check your network configurations in the Control Panel then try the connection again.

It took a call to the Commission's help line to learn the caller's network configurations were fine, and the system was simply too busy to respond. ULS could prompt the user's computer to deliver a more helpful message if it simply returned a busy signal or hung up quickly.

[6]The Commission should also provide an E-mail address (and telephone number, for those lacking E-mail) for reports of suspected bugs or incompatibilities. Even a few minutes of casual experimentation with the system turned up a few. When Microsoft Explorer was used, for example, typed-in data sometimes self-deleted after opening and closing a form or message on top of it — including a form the instructions urged the caller to open and read. In the Netscape configuration, the ULS "Home" button tries to reload from cache rather than the network, and does not work after a long session has overwritten early cache. There should be an easy and obvious way to notify the Commission of problems like these.

3. Mandatory electronic filing

For all the reasons just discussed, the Commission should postpone the start date for mandatory electronic filing. A start date of January 1, 1999, for mandatory electronic filing is unrealistic. Many sophisticated users, including large licensees, coordinators, and equipment distributors, will not be ready by that date. Small users will find it even more difficult, especially if they must first acquire and/or configure needed computers and software. Many small users will not even be aware of a requirement for electronic filing by next January, unless the Commission intends to mail a detailed notice to each one and deal with the flood of telephone inquiries that will ensue. Moreover, an adequate transition period would provide the opportunity to test the system itself and correct the inevitable "bugs" and make sure that ULS has the capacity and expertise to handle the volume and the diversity of filings. Until the problems have been solved, the paper filing option should be available.

4. Filing pleadings associated with applications

Here, also, filers should have the option to file pleadings associated with applications either electronically or on paper. Such pleadings address specific issues on specific applications and normally are of interest only to the parties involved. The need for electronic filing is not compelling. On the other hand, paper copies can be easily distributed to interested parties as well as to Commission personnel and, therefore, filers should have that option available to them.

5. Letter requests

Letter requests should continue to be acceptable in the special situations

contemplated in Section 308(a) of the Act, for special temporary authorizations, for rule waivers, for requests for exceptions, etc. Such requests relate to unique and unusual circumstances that cannot be addressed adequately in a question and answer format in an application form. In such cases, applicants should be allowed to state their case in a narrative format, to explain the unique circumstance or the emergency involved, or the public interest factors which, in their view, justify grant of the particular request. It is difficult to see how those matters can be adequately addressed in response to questions in a form. Applicants must have the option to submit their case in a written statement.

B. Standardization of practices and procedures for WTB applications and authorizations

1. Consolidation of procedural rules in Part 1.

FIT respectfully submits that the proposed consolidation of all application procedural rules in Part 1 is neither necessary for the implementation of the proposed ULS nor desirable. As previously noted, this proposal would result in a lengthy, complex set of rules over forty-two (42) pages long, many of which would not apply to applicants in many service categories. Nevertheless, such applicants would have to wade through over forty pages of regulations to determine the rules that would apply to them. The current practice of having the application procedural rules together with the service substantive rules has worked well. It is not clear why the proposed consolidation is a necessary element to the full implementation and operation of the proposed ULS. It appears that the proposed consolidation of these rules is a solution in search of a problem. The proposed consolidation would not only create an

unnecessarily complex set of rules but would also, by virtue of the consolidation, impose upon many applicants, particularly applicants and licensees in the various private services, some of the regulatory "baggage" which by law are now carried only by licensees in the commercial wireless services. Therefore, FIT suggests that the Commission should leave the structure of the application procedural rules substantially unchanged and make only those changes that are necessary to achieve greater simplicity and uniformity, where uniformity is absolutely necessary.

2. Standardization of "major" and "minor" filing rules

FIT supports standardization of the definitions of "major" and "minor" changes but with the following qualifications and caveats. First, the proposed requirement for applicants to file a "major" amendment to a pending application when there has been a substantial change in the ownership of the applicant should not be made applicable to applicants in the private services. Ownership of an applicant in the private non-broadcast services is of no decisional significance, except for the restriction on foreign government ownership specified in Section 310 of the Communications Act. Second, major amendments to private land mobile applications need not be put on public notice. Third, where frequency coordination is required, major technical amendments should be required to be prior-coordinated. Fourth, amended applications in the private land mobile services should be placed in their original position in the processing line, if they are timely re-submitted. Finally, some flexibility should be incorporated into the definition of "major" changes so that small technical changes in the categories listed as "major" do not require amendments or license

modifications. However, instead of the approach embodied in Section 101.29(c), FIT suggests adoption of a percentage of change which would be permissible without application amendment or license modification. For example, a 3 dB increase in ERP without prior Commission authorization would be excessive, in that it would permit doubling the ERP of a facility without prior coordination or Commission authorization. On the other hand, a three meter increase of an antenna 1000 feet above ground would be de minimis. Therefore, FIT suggests that a percent of change, such as 5 to 10% in power and antenna height, and no more than 5 seconds change in either latitude or longitude, be permitted without prior Commission authorization or amendment to a pending application. All other technical changes should require application amendment or prior Commission authorization and, of course, where required, frequency coordination.

3. Submission of ownership information

The proposal to adopt a single consolidated rule to govern the submission of ownership information by all wireless applicants and licensees is neither necessary or desirable. This is because ownership information is not of the same decisional significance in all radio services. In fact, ownership information has not been requested of applicants in the private land mobile radio services for nearly half a century. It is not clear why such information is now necessary or desirable for licensing or administering the private services. Any entity, except a foreign government or a representative of a foreign government, is eligible for a private land mobile license if it is engaged in an eligible activity. The ownership of that applicant,

except for the foreign government restriction, is immaterial. The regulatory concerns referred to in Paragraph 43 of the Notice, such as spectrum cap, cellular cross-ownership restrictions, or special treatment of small business, are not applicable to the private land mobile services. Thus, to require submission of ownership information solely for uniformity sake is not justified.[7] Therefore, the proposal, and the use of Proposed FCC Form 602, should be confined to the CMRS services and perhaps to non-CMRS auctionable services.

In sum, ownership information should be obtained, only to the extent needed and only from applicants in those services where such information is of decisional significance. Ownership information is not of decisional significance in the private land mobile radio services and should not be obtained from applicants in those services.

4. Frequency coordination of amendments and modification applications

FIT suggests that both "major" amendments to pending land mobile

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[7]In Para. 47, the Notice refers to the requirement in Part 101 for the disclosure of the party in interest to the application as part of the justification for the proposal to require ownership information from all applicants. Presumably for the same reasons, questions 12-22 in Proposed Form 601 require information about the "real party in interest." It is not clear how the Commission would use that information, and how an applicant should respond to those questions, particularly if the applicant is a publicly held corporation. It would appear that an affirmative response to those questions would indicate that the applicant is not the true applicant but a surrogate of the "real" applicant and the application should be dismissed. If the purpose of these questions is to obtain in-depth information about the ownership of the applicant, then either the rule (Proposed Section 1.919) or the instructions to the form must specify the degree of ownership information to be submitted. In FIT's view, questions 12-22 in the proposed forms are inappropriate and should be deleted, or they should be re-phrased to ask for more specific information. In any event, these questions should not apply to applicants in the private services.

applications and applications for "major" technical changes to existing stations should be coordinated before submission to the Commission.

5. Return and dismissal of incomplete or defective applications

FIT agrees that batch, interactive, and manually filed applications should be subject to substantially the same requirements and procedures with respect to handling "defective" and "incomplete" applications. Defective and incomplete applications should be returned or dismissed regardless of how they are filed. FIT recommends, however, that the Commission retain the 60-day resubmission period rather than reducing that period to 30 days as the Commission has proposed. Also, where public notice is not required, an application re-submitted in good order within the resubmission period (30 or 60 days) should retain its place in the processing line, even if it has been amended and the amendment is "major." FIT agrees, however, that applications which have been dismissed as defective should be considered "new" even if re-submitted within the 30 or 60 day period.

6. Handling of confidential information

FIT supports the proposal discussed in Para. 54 of the Notice for the handling of confidentiality requests and for safeguarding information accepted as confidential.

7. License reinstatement

While FIT supports the proposal to provide all wireless licensees with pre-expiration of notification[8] (assuming this would be feasible and more reliable than it

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[8]Because not all private land mobile licensees are equipped to receive electronic mail, the pre-expiration notification should be sent by regular mail.

has been so far), FIT objects strongly to the proposal to do away with "reinstatement" applications. In many private wireless services radio is a tool, not the primary business activity of the licensee. Employees handling licenses come and go and, even with pre-expiration notification, inevitably renewal applications inadvertently are not submitted in time. The current, 30-day grace period provides an added opportunity to avoid license cancellation and should be retained.

8. Construction and coverage verification

FIT believes that the Commission should verify that authorized systems are constructed in time and that licenses should be cancelled automatically for failure to construct. Pre-construction notification would be helpful to all new licensees. However, because of the large number of wireless licensees, for practical reasons the Commission may want to confine pre-construction notification to exclusive licenses.

9. Assignments of authorization and transfer of control

FIT supports the proposal to replace some of the various current forms used for the assignment or transfer of control of wireless licenses. However, FIT suggests that Forms 1046 and 703, now used in the private services, should be retained. Those forms are simple to use and provide all of the information the Commission needs. FIT also suggests that post-transaction Commission notification should not be required in private service. Post-transaction notification has not been required in the private services for over half a century and FIT is unaware of any resulting problems. It is, therefore, recommended that the post-transaction notification requirement be confined to the commercial radio services.

10. Change to North American Datum 83 coordinates data

Should the Commission determine that changing the vast record of licenses, antenna, etc. to Datum 83, is necessary and important, it should be done gradually. Applications with Datum 27 coordinates should continue to be accepted, the conversion should be done by the Commission, and licenses should be issued with the Datum 83 coordinates.

11. Use of taxpayer ID numbers

While FIT recognizes the obligation of the Commission under the Debt Collection Improvement Act to collect taxpayer ID numbers (TIN) for debt collection purposes, FIT does not believe that it is either necessary or desirable to use that number as the licensee ID in the Commission's database. The TIN, and especially an individual's social security number, is highly private information and should not become a part of a widely accessible database, even with the access safeguard proposed in the Notice. Moreover, the use of TIN (as well as the need to use a password to obtain access to a licensee's file at the Commission) would complicate the task of frequency coordinators. They would need to collect TINs or social security numbers, which may be difficult to do, and to safeguard that information. Furthermore, it is not clear how TINs would be handled in license transfer situations, particularly where transfers may be involuntary. For these reasons, FIT strongly suggests that the Commission itself should assign licensee identification numbers (LIN) the sole function of which would be to connect the licensee with all of the call signs assigned to that licensee. A precedent for such a practice already exists in the

Commission's assignment of such numbers to licensees of private microwave (OFS) stations. The Commission is urged to reconsider its taxpayer ID proposal.

C. Collection of licensing and technical data

1. General

The Commission's desire to minimize the amount of technical information to be collected from geographic licensees is understandable. However, because all radio systems contribute to interference problems, basic information about radio facilities constructed by geographic licensees should be in the public record. Coordinators, Commission personnel, and affected licensees should have access to that information in order to be able to track down interference problems. Where geographic licensees would share the same spectrum with grandfathered incumbents, the need for technical information from geographic licensees is even greater. In these situations, technical information should be provided before construction so that the Commission would be in a position to determine whether the incumbents would be protected adequately. In short, geographic licensees should be required to provide basic technical information, such as the location of fixed or base stations, ERP, antenna height, emission, etc.

A major concern in the forest products industry is the need to obtain sufficient information to coordinate mobile or fixed relay systems in the VHF bands, both low (30-50 MHz) and high bands (150-160 MHz), which are used to achieve the wide area coverage required in that industry. Unfortunately, the VHF frequencies are not paired and the mobile and fixed relay frequencies are almost unique to each system.

To coordinate properly, a coordinator must have the "input" frequencies to the mobile or fixed relay station in existing systems. Those frequencies are not made routinely available. Therefore, FIT urges the Commission to require that information from applicants or licensees of mobile or fixed relay systems in the VHF bands.

2. Use of Notification or certification in lieu of information filing

FIT supports the proposal to increase use of notification or certification instead of information filing, as contemplated in Paras. 80 and 81 of the Notice.

D. Other matters

1. Special temporary authorizations (STA)

FIT respectfully submits that the circumstances listed in proposed Section 1.931(b), in which special temporary authorization may be granted, are too limited. Section 308(c)(2)(G) of the Communications Act, for example, contemplates the issuance of 60-day STAs in non-emergency situations pending the filing of an application for a regular authorization. Thus, limiting of STAs to emergency situations and to situations of such extraordinary nature that delay in the institution of temporary operation would seriously prejudice the public interest as proposed in Section 1.931(b)(2)(A) and (E) would be inconsistent with Section 308(e)(2)(G) of the Act and is otherwise unreasonable. STAs serve very good purposes, act as pressure release valves in pressure situations, and are easily handled. They should be more available than it is proposed. As a minimum, the language or the substance of Section 308(e)(2)G of the Act should be added to proposed Section 1.931(b)(2).