

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

In the Matter of)
)
Amendment of the Commission's Rules to)
Allocate for Public Safety Use a Portion of) RM-9274
the 138-144 MHz Band Being Reallocated) WT Docket 96-86
by the Federal Government Pursuant to the)
Balanced Budget Act of 1997)

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To: The Commission

COMMENTS OF THE
FORESTRY-CONSERVATION COMMUNICATIONS
ASSOCIATION

The Forestry-Conservation Communications Association ("FCCA") hereby submits the following comments in response to the Commission's Public Notice, dated May 13, 1998, inviting comments regarding the above-captioned Petition of the National Public Safety Telecommunications Council ("NPSTC") seeking a "Further Rulemaking to Allocate Spectrum in the 138-144 MHz Band for Public Safety."

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 services, including fire protection, law enforcement, and emergency medical services over wide areas of state-owned and/or state-protected lands.

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FCCA, IAFWA, and NASF are members of NPSTC, and fully support its Petition seeking a reallocation of a portion of the 138-144 MHz band for public safety use. This portion of the radio spectrum (the VHF "High Band") is particularly attractive for forestry conservation activities due to its superior propagation characteristics for wide area operations, especially in mountainous, heavily wooded areas. The current VHF High Band allocations at 150-170 MHz are inadequate to meet current and future public safety needs, and newly allocated spectrum in the 800 MHz range will not be appropriate for many forestry-conservation and similar public safety uses. FCCA also supports the goal of identifying interoperability spectrum in the VHF High Band, as its members' emergency field operations often require coordination between various public safety agencies from different levels of government.

Therefore, for the reasons set forth above and in the NPSTC Petition, FCCA urges the Commission to take appropriate steps to facilitate the reallocation of a portion of the 138-144 MHz band for public safety use.

Respectfully submitted,

FORESTRY-CONSERVATION
COMMUNICATIONS ASSOCIATION

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