

RECEIVED

APPLIED TECHNOLOGY GROUP, INC.
4440 EASTON DRIVE
BAKERSFIELD CALIFORNIA 93309-1028

JUNE 23, 1998

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W., room 222
Washington DC 20554

Re: RM-9267, Concerning an allocation of spectrum for the Private
Mobile Radio Service(PMRS).

Dear Ms. Salas:

We respectfully submit these Reply Comments in regard to the above referenced and captioned Petition for Rule Making filed by the Land Mobile Communications Council(LMCC). My company has served the PMRS industry since 1949. Presently, we operate an SMR service for which the entire much-needed spectrum is frozen. It is easy to see that spectrum freezes were to be in best effort to serve one eastern firm, with excellent friends, over the Land Mobile Radio Community.

Radio license mills offered little ladies a way to get rich. They did not have transmitter sites, vendors, or working knowledge to put the system into operation. Recent auction winners are in the same boat. No product and no market = bankruptcy.

The Finders Preference was a good rule to clean out the pure speculators. We have a customer that approached our firm to install ten 800MHz frequency pairs at our Pine Mt. Repeater site. We determined that all frequencies were licensed to speculators west of the Mississippi river. The spectrum has been idle for the last several years. All attempts at receiving a license assignment to Applied have failed.

We wholeheartedly support the spectrum allocation objectives contained within the LMCC's Petition for Rule Making and the Council's request that meaningful dialogue must commence among the telecommunications leadership regarding the state of the private wireless industry. All uhf spectrum in California's central valley is subjected to co-channel interference because of the Commission's flatlander mind set i.e. "one rule works for all". Transmitters do not interfere with transmitters. A receiver hears interference from a mobile unit or from several transmitters mixing their signals on site. We need 105-mile separation between repeaters instead of 70 miles. The 70-mile rule produces a thirty-five mile system overlap and degraded operation.

Applied is trying to serve two major firms that need extra spectrum for plant expansion. The first is a major nationwide oil firm and the second is a large

No. of Copies rec'd 1

List A B C D E

nut grower in the Central Valley of California. What do we tell these people who depend upon two-way radios for growth, security, and plant management? Refarming below 470MHz is weak solution that gives us no hope to eliminate co-channel or adjacent channel interference sources. It would better to let existing licensees split their working channels into three digital channels.

We see speculators at work trying to hog any new spectrum derived from spectrum Refarming. We need the applicant's statement to justify wholesale license grants.

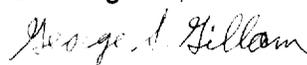
Recent national telecommunication policy has been directed at maximizing competition between commercial service providers through the exclusive use of spectrum auction procedures. We can easily see the follies in these plans. Just look to see who won the 800MHz auction and see who could not waste their precious dollars against a stacked deck. Talk about discrimination and government waste and the least best utilization of spectrum. My customers need a local system with local service. They do not want to bid in an auction for region-wide blocks of channels.

We, therefor, support the Industrial Telecommunications Association's proposal that the Commission should diligently seek congressional authority: to implement efficiency-based spectrum lease fees as a private wireless license assignment as an alternative to competitive bidding procedures. Lease fees, if responsible, would promote spectrum efficiency. The FCC is required to regulate the radio spectrum and not sells it for a big profit. We have to think about our coming generations. Are we going to leave them with anything but static and blocked calls?

We also share the views, expressed by a number of commenters in this proceeding, that commercial providers are not equipped to accommodate all of the communication requirements of private wireless entities. In many private wireless system application, the product, geographic coverage and system integrity requirements simply cannot be satisfied through the communication services offered by cellular, PCS, and cellular look-a-likes. Just look at the overwhelming success of the Family Radio Service. All you have to do is pick up handset and talk. No license is needed. Business and industrial users need range and dependability at a reasonable cost. These licensees, like their public servants, need to be assured that they can operate on their radio systems from now on into the future. PMRS need to have a communication system atleast as good as the garbage collector

We appreciate the opportunity extended by the Commission to participate in this critical proceeding and request that the Commission expeditious proceed to adopt a Notice of Proposed Rule Making consistent with the objectives of the LMCC's Petition for Rule Making.

Best regards,



GEORGE S GILLAM

Cc: Representative Bill Thomas
ITA



1208 Cromwell Avenue Rocky Hill, CT 06067

DOCKET FILE COPY ORIGINAL

June 25, 1998

Ms. Magalie Salas
Secretary, FCC
Room 222
1919 M Street, NW
Washington D. C. 20554

RECEIVED

Re: LMCC Petition for Rulemaking (RM-9267)

Dear Ms. Salas:

I strongly support LMCC Petition for Rulemaking (RM-9267). The fast action by the FCC in seeking a public dialogue is commendable.

Our business is engaged in the commercial activity of designing, selling and installing two-way radio systems to industry, institutions, and government entities throughout Connecticut. We have been in this business for over 10 years and currently employ 15 people. Our customers depend on private two-way radio systems to improve the safety and efficiency of their operation.

A private two-way radio system provides communications in a way that cellular and PCS phone type systems cannot. Our customers have a need for instant, fleet-wide communications. Private systems may be designed in many different configurations allowing us to meet the specific coverage requirements of our customers.

In many instances, we are unable to provide private two-way radio systems to customers who could derive benefit from such a system due to the fact that we are unable to locate a suitable radio frequency. These customers are unable to enjoy the safety and productivity that is possible through the use of a private two-way radio system. Surely, this is not in the public interest.

The FCC should proceed as quickly as possible with this petition. We are experiencing strong economic growth in Connecticut and the lack of spectrum is a major impediment for both my company and our customers. Thank you for your prompt attention to this matter.

Sincerely,

Bill Charamut V.P.
Connecticut Radio, Inc.

No. of Copies rec'd 0 + 2
List A B C D E
OET

