

frequencies. Accordingly, NABER urges the Commission to refrain from adopting its proposal in regard to redesignation of the service pools for 800/900 MHz channels.

7. Proposal for "Vertical Coordination". The Commission proposed a new goal under its proposed rules for "refarming" below 800 MHz in connection with the coordination of frequencies. The Commission suggested that the frequency coordinating committees coordinate systems as close geographically as possible without causing interference with an effort to retain as large a spectrum reserve as possible. Under this proposal, it would appear that a frequency coordinator would be required to "stack" small users on one frequency in a specific geographic area even though other frequencies might be available that are less congested or less used. NABER believes that its recommended "bandwidth on demand" and "pools for power" achieve the Commission's goal. However, without these specific proposals being adopted, NABER is not confident that the Commission's proposal, as written, would achieve the spectrum efficiency sought or be beneficial to the smaller users.

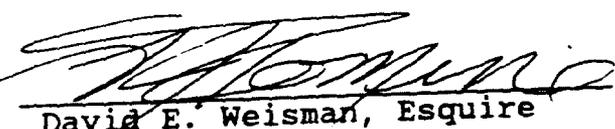
V. CONCLUSION

NABER supports the Commission's ultimate goal to increase the spectrum efficient use of the PLMRS bands below 800 MHz thereby providing additional capacity for future applicants and better quality service for existing licensees. NABER believes that the proposals that it has set forth accomplishes the Commission's goals but with less detrimental affect on current licensees.

WHEREFORE, the National Association of Business and Educational Radio, Inc. ("NABER") respectfully requests that the Federal Communications Commission take action in this proceeding in a manner consistent with the proposals set forth herein.

Respectfully submitted,

NATIONAL ASSOCIATION OF BUSINESS
AND EDUCATIONAL RADIO, INC.

By: 

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Date: May 28, 1993

CERTIFICATE OF SERVICE

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Ruth A. Buchanan