

Additionally, it should be noted that skywave service is clearly defined by the Commission's policies as *secondary* service, because it is subject to substantial fading which is the rationale for specifying it as only a 50% time availability service. The Commission's rules also clearly describe that signal levels below 2 mV/m do not provide service to communities with population greater than 2500 persons. [§73.182(d)] The 10% time interference signal value is also unnecessarily conservative, and at odds with the value (50% time) used elsewhere in most of ITU Region II as well as in Regions I and III. In general terms, skywave service is ephemeral and no longer of public interest value.

Class B and D stations:

Studies by several commenters show purported losses of service to class B and D stations from the proposed changes in protected service and in co- and adjacent channel overlap rules. Not only do these studies misleadingly characterize overlap as interference,* they also appear to suffer from not considering the §73.182(d) rule. Not only does this rule require 2 mV/m to provide meaningful service to communities with population greater than 2500, the Commission's principal community coverage requirement, 5 mV/m, makes clear that lower levels of signal are essentially meaningless in providing useful service in the modern high noise level environment. We therefore continue to support the Commission's proposals for service and interference contour overlap calculation.

Class C stations:

Some commenters decried the effect of changing the normally protected contour of class C stations to a higher value. These parties appear to not be aware that the basic allocation rules for class C stations already effectively define the protected contour of class C stations for some purposes as 1 mV/m with respect to other class C stations, since the (rather complex) class C rules [73.37(b) & (c)] consider new class C station overlap receipt on the basis of 250 watt operation, and allow existing class C stations to increase power to the maximum for that class "notwithstanding overlap prohibited by paragraph (a)..."

Conclusions

To reiterate from our Comments, as described quite succinctly in the Commission's NPRM text, modification of the rules to return to 0 dB first adjacent channel protection is justified. Additionally, a 500 μ V/m signal is essentially unuseable in the noise environment that now exists. Therefore revising the second adjacent channel protection to 25 mV/m overlap and

* Overlap of service by an interfering contour will show a far larger area than interference calculated on the basis of desired vs. undesired signal strength. This is a very basic spectrum management concept.

modification of the normally protected service area to the 2.0 mV/m contour is another valid method of providing standards which will allow station modifications to overcome the prevalent noise level of the modern environment.

Respectfully Submitted,

Hatfield & Dawson Consulting Engineers, LLC

A handwritten signature in blue ink, appearing to read "Benj. F. Dawson III", with a stylized flourish at the end.

by Benj. F. Dawson III, P.E.