

EX PARTE OR LATE FILED



November 5, 1998

Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
1919 M Street, N.W. Room 222
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Public Notice seeking comments on Petition for Declaratory Ruling on Streamlining the Commission's Antenna Structure Clearance Procedure, WT Docket 95-5.

Dear Ms. Salas:

Enclosed herewith are the comments of the National Spectrum Managers Association in response to the Public Notice DA 98-204 in WT Docket 95-5.

Sincerely,

NSMA

Christopher R. Hardy
Vice President
Enclosure

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of]
]]
Petition for Declaratory Ruling Concerning]
the Commission's Streamlined Antenna]
Clearance Procedure]

WT Docket 95-5

COMMENTS OF THE NATIONAL SPECTRUM MANAGERS ASSOCIATION

1. On October 8, 1998, the Commission released a Public Notice seeking Comments on a Petition for Declaratory Ruling on Streamlining the Commission's Antenna Structure Clearance Procedure ["Petition"] filed by Teletch, Inc. ["Teletch"] on June 4, 1996. This Petition requests the Commission clarify its antenna structure registration requirements to state: [1] the acceptable form of measurement; [2] the accuracy requirement of the survey device; and [3] the accuracy standard to which an antenna site owner must measure the geodetic latitude and longitude and elevation of an antenna structure. Furthermore, Teletch seeks guidance on registering multiple antennas on the same building.
2. The National Spectrum Managers Association ["NSMA"], established in 1984, is a voluntary organization made up of individuals who serve as microwave radio/wireless and satellite frequency coordinators, licensees, and manufacturers. The role of NSMA is to supplement the Commission's coordination rules with procedural and technical recommendations developed in an open industry forum of coordinators, licensees, and manufacturers. The NSMA's objective is to make the frequency coordination process more efficient and effective.
3. Certainly, the NSMA is not challenging this need for aviation safety and the potential for aviation disaster that could result from utilization of incorrect

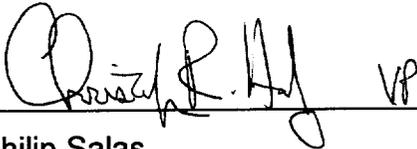
information in the Commission's database and ultimately in what is filed with the FAA and is included in their database.

4. The NSMA's specific concerns relate to the necessity for fixed service and satellite applicants providing and using accurate data in their frequency coordination process. The correct latitude and longitude is needed to conduct an accurate frequency interference study. This cannot be accomplished without error if the input data, the latitude and longitude, are not accurately provided.
5. The capability to reuse the same frequency many times in a given area results from the attenuation of the undesired signal by the use of highly directional antennas, coupled with the accurate evaluation. Accurate coordinates are necessary so that the interference evaluation may utilize the proper antenna discrimination value in its study. A difference of only one degree in antenna azimuth could result in a difference of as much as 33 dB in the level of the interfering signal.
6. Paths which are extremely short require the use of tenths of a second to express the latitude and longitude to allow for an accurate determination of the path azimuth so that a proper evaluation of antenna discrimination may be made to ensure that the interference study will represent the actual conditions once the station is constructed. Furthermore, stations which are physically located close to each other will also require coordinates expressed to the nearest tenth of a second to ensure that a proper evaluation is made of the true relationship and antenna discrimination values between the two stations.
7. Frequency coordination also requires the use of accurate ground elevation and antenna centerline data. This is needed to allow for frequency reuse based on the existence of over-the-horizon loss ["OH Loss"] between the two co-channel users. The amount of the reduction of the interfering signal as a result of terrain, building, or other blockage is affected by the height of one or both of the stations.

8. Based on the above, the NSMA believes that the use of accurate coordinates and elevations is needed to permit accurate and meaningful frequency coordination which will result in the reuse of the same frequency over and over within the same area.

Respectfully submitted,

NATIONAL SPECTRUM MANAGERS ASSOCIATION

By:  VP.

Sr M. Philip Salas
President - NSMA

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