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

In the Matter of)
)
Establishment of Public Service Radio) RM-9405
Pool in the Private Mobile Frequencies)
Below 800 MHz)

COMMENTS OF PACIFICORP

Pursuant to Section 1.405 of the FCC's Rules, PacifiCorp hereby submits its Comments in support of the above-referenced "Petition for Rulemaking" filed on August 14, 1998, by UTC, The Telecommunications Association (UTC), the American Petroleum Institute (API), and the Association of American Railroads (AAR).

Introduction

PacifiCorp is an electric utility engaged in the generation, transmission, and distribution of electrical energy for use by the general public in the states of Washington, Oregon, California, Idaho, Utah and Wyoming.

PacifiCorp has in operation an extensive private land mobile radio communication system which is essential to the safe and reliable operation of the company's electrical system. Wide area dispatch communications are critical for the safe and timely restoration and maintenance of electrical service. We are operating approximately 215 fixed base

stations and approximately 4,000 mobile and portable units in the VHF (150-160 MHz) band. In addition we operate about 100 control links to these base stations. These links are primarily UHF(450-470 MHz) with a few low-band VHF (70-74 MHz). We also use an additional 25 mobile repeaters with about 800 mobile and portable units in the UHF (450-470 MHz) band mainly at our steam electric generating plants. We also use several data links in the 154-173 MHz band.

Comments

Secure frequencies are essential for the safe and efficient operation of the electric utilities radio system. While secure frequencies are available in the 800/900 MHz bands, PacifiCorp has chosen to maintain its critical mobile operations in the VHF band. The VHF band propagation characteristics are needed to cover our diverse service territory and is typical of the utilities in the northwest. The majority of our service territory is sparsely populated and in the best interest of the public we serve, wide area coverage is essential given the limited frequencies. Wide area coverage is difficult with the wide variety of topography encountered in our area. Several studies have shown that the best frequency band to use to achieve the required coverage is high-band VHF (150-174 MHz).

The existing frequencies held by the utilities in the northwest have been carefully coordinated as to not cause interference to other utility users. As more users are allowed to casually locate on the frequencies as a result of the change in coordination rules, utilities are required to build into their systems back-up channels creating an inefficient use of spectrum. Careful coordination, as has been proposed, could prevent or reduce

spectrum inefficiency. Competitive frequency coordination can jeopardize the careful coordination in place.

Restoration crews use the radio to rebuild the electrical system after a storm or catastrophic event. Coordination over the radio allows a secure channel to coordinate switching and re-energizing high voltage lines when other forms of communications are not yet available. With crews working around the clock, putting in shifts as long as 36 hours, safety is critical and time is of the essence. During the winter, homes need power to provide heat and essential services. Deployment of the radio without outside interference allows for a quicker restoration and coordination of crews.

PacifiCorp is implementing mobile repeaters and hopes to be able to convert to other advanced technologies in the future to provide better service. A common system is used for all areas, metropolitan and rural, to allow communications to vehicles moving within the company's service territory and without requiring multiple radios in each vehicle. This common system is essential during emergency restoration operations and to provide a safe environment for our high voltage line crews. The petition for rulemaking addresses this issue and helps to ensure the ability to provide future essential services.

PacifiCorp's success during storm restoration has been its ability to transport crews from other districts of the company. In order to accomplish this task, PacifiCorp maintains a standard program on all of its 4000+ mobile radios. Careful planning and coordination of each of these channels is very time consuming and requires considerable effort to maintain and keep clear of interference.

During construction of powerlines, channels must be kept clear and without interference so that precise adjustment of line tension can be accomplished. Without a

channel clear of interference, major destruction can occur to property. Interference causes users to turn down the volume on their radios thereby decreasing the likelihood that others will hear that another worker is in trouble. This is a safety issue and can cause the shutdown of restoration projects.

The creation of a Public Service Radio Service takes into account the different nature of electric utilities. There are many services of government agencies that do not fit within the category of "protection of life and property" or "public safety". We are often called upon for emergency removal or restoration of utility services for protection of life or property. It is critical that we not be forced to contend for limited frequencies with the same priority as the general public.

Conclusion

In conclusion, PacifiCorp supports the Petition for Rulemaking, and urges the FCC to promptly issue a Notice of Proposed Rulemaking looking toward the creation of a Public Service Radio Service as described in the Petition.

Respectfully submitted,

PacifiCorp

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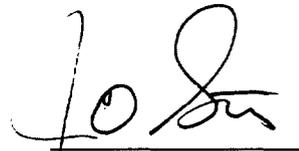
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Comments of PacifiCorp" was sent by first-class mail, postage prepaid, to the following persons this 18 day of December, 1998.

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