

**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 PACIFIC GAS AND ELECTRIC

Pursuant to Section 1.405 of the FCC's Rules, Pacific Gas and Electric (PG&E) 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

PG&E is a utility which provides gas and electrical power to over seven million customers across its 94,000 square-mile service territory. PG&E supplies electrical power and/or natural gas to residences, businesses and industry, hospitals, nursing homes, public safety entities, communications facilities and sanitation facilities. Consequently, virtually every aspect of daily life within the PG&E service territory is affected by its utility operations. The company's land

mobile radio system is used to ensure continuous, reliable delivery of its energy products to the public during routine, day-to-day maintenance as well as during times of emergency.

Comments

The adoption of the “Petition for Rulemaking” to create a “Public Service Radio Service” will further an important public interest. The land mobile radio system permits PG&E to operate at an extremely high level of efficiency in its routine inspection and maintenance and operations. PG&E uses the system to transmit dispatch information to crews, to monitor their progress and to coordinate changes. This results in a high level of flexibility in the expenditure of PG&E’s workforce and results in less waste of the utility’s limited resources.

Consequently, the land mobile system serves a continuous public interest, not only by ensuring that maintenance is conducted efficiently and effectively, but by doing so economically, a benefit to ratepayers.

In times of power disruptions or acute malfunctions in PG&E’s utility infrastructure, the land mobile system is invaluable to PG&E in its efforts to restore normal power and gas delivery as safely and as rapidly as possible.

Identifying emergency situations, directing the appropriate type and number of PG&E personnel to those situations, and monitoring the progress of containment and restoration efforts are all critical functions which are utterly dependent upon

the land mobile system. Interruptions to the delivery of power and gas, whether caused by natural catastrophes or other system failures, have the potential to result in profound consequences, both from the loss of the underlying energy resources and because of the potential hazards associated with natural gas and high voltage electrical facilities. The rapid and safe restoration of power is dependent upon clear and reliable communications capability. In this regard, PG&E's operation of its land mobile radio system serves an extremely important public safety interest.

The reliability of the radio service that serves the safety needs of workers plus affect the lives of hundreds, thousands or even tens of thousands of people should not be subject to harmful interference. PG&E is concern with competitive frequency coordination and the quality of coordination. There is danger of harmful interference if different users are consolidated without regard to the specialized needs and requirements of critical industries, such as the utilities. This would create an unacceptable risk of interference and in the process sacrifice safety, reliability, and public service.

The Petition for Rulemaking proposes a reasonable solution that will help ensure that the ability of critical infrastructure industries to provide essential public services is not jeopardized. PG&E's ability to provide electrical power and natural gas with a maximum level of safety and with a minimum of interruption depends upon reliable, comprehensive, interference-free communications capabilities.

PG&E will adequately be able to accomplish this within the proposed “Public Service” pool filed jointly by UTC, API, and AAR.

Conclusion

In conclusion, Pacific Gas and Electric 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,

PACIFIC GAS AND ELECTRIC

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Comments of Pacific Gas and Electric was sent by first-class mail, postage prepaid, to the following persons this 23rd day of December, 1998.

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