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Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
The Portals
445 Twelfth Street, S.W.
Washington, D.C. 20554

Re: **The Development of Operational, Technical and Spectrum Requirements For Meeting Federal, State and Local Public Safety Agency Communication Requirements Through the Year 2010 (WT Docket No. 96-86).**

Dear Ms. Roman Salas:

The U.S. GPS Industry Council (the "Council"), the Air Travelers Association, American Airlines, the General Aviation Manufacturers Association, Outreach, Stanford University (The GPS Research Program), and United Airlines (collectively referred to as "GPS Commenters"), by counsel, herein file an erratum to its Comments filed on January 19, 1999, in the above-referenced proceeding. Due to technical word processing problems, changes that were made to the Comments are not reflected in the copy as filed with the Commission. Minor changes, as follow, are included herein to conform the Comments as intended to be filed:

- 1) Page iii of the Summary. The word "[s]econd" in the first sentence of the first full paragraph on page iii of the Summary is hereby deleted. Also, in the same paragraph, the last sentence is hereby removed and replaced with the following text:

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The need to protect GPS is, and must remain the Commission's paramount objective. If GPS is not protected, it does not matter what positive attributes an insufficient criterion may offer the prospective makers of equipment for the 700 MHz band — the criterion would have to be rejected.

The word “[t]hird” in the first sentence of the second full paragraph on page iii is hereby deleted. At the end of this paragraph, the following text is hereby added:

The burden of evidence must be on the proponents of new services to show that they do not create harmful interference in the RNSS bands. However, such showing has yet to be provided to the Commission or the GPS Commenters.

In addition, the last paragraph on page iii is hereby removed and replaced with the following:

The GPS Commenters can conceive of no circumstance under which it would be consonant with the public interest for the Commission to adopt rules that establish the groundwork for a new public safety system that would, by its very existence, endanger a dynamic, growing, and absolutely vital existing public safety service. The Commission must thus ensure the protection of the GPS user base by refusing to adopt any emission standard that would jeopardize the operation of GPS receivers and that would be counter to existing public law requiring the prevention of disruption and interference to GPS.

- 2) Page Four (4). The last sentence of the second paragraph on page four (4) is hereby deleted.
- 3) Page Seventeen (17). The second sentence on the first full paragraph on page 17 is hereby deleted.

Accordingly, the GPS Commenters hereby request that pages three (iii), four (4), and seventeen (17) of the Comments, as filed, be replaced with the enclosed corrected pages.

GLONASS, the Russian GNSS, would be similarly devastated by the proposed harmonic emission levels. This system has been developing more slowly than GPS, and currently augments GPS capability. It is generally believed that GLONASS will mature to play an important synergistic role. Significantly, the Russians successfully added three more satellites to their constellation in December, 1998. This portion of the band is reserved for aeronautical safety of life applications and, by this allocation definition, is required to serve that purpose. The current plans to expand and modernize the GPS signal structure clearly recognize that GPS is rapidly becoming an international information utility serving a broad user base in public safety, commerce, and the individual consumer. This growth validates the efficient use and value of the entire ARNS band. The U.S. commitment to GPS modernization clearly bestows recognition of the urgent need to preserve the integrity of the band for future demand.

The GPS Commenters note that a suppression of 80 dB truly does not represent a meaningful attempt to be a responsible neighbor to a public safety band, given that the harmonic is located some 794 MHz above the proposed carrier. Furthermore, the technical capability exists to achieve greater suppression, and must be implemented to serve the public safety.

I. INTRODUCTION

The U.S. GPS Industry Council is a non-profit 501(c)(6) industry trade association whose mission is to be an information resource to the Government, the media, and the public on GPS. The Council's purpose is to promote sound policies for the development

suppression standard in the frequency range of 1559-1605 MHz of 90 [120] dB down from the maximum effective radiated power of the carrier and handhelds and portable units must meet a minimum second harmonic suppression standard in the frequency range of 1559-1605 MHz of 80 [110] dB down from the maximum effective radiated power of the carrier. This standard applies only to equipment operating in the frequency range of 779.5-802.5 MHz.

The GPS Commenters note that such a solution should be technically feasible.

Certainly, harmonic suppression of 120 dB should be feasible over a frequency span of 794 MHz.

In sum, the importance of the protection obligation the Commission has with respect to GPS cannot be overstated. Economic considerations, while always relevant, simply cannot be permitted to dictate the outcome of this issue.

E. The Burden Of Evidence Must Be On Public Safety Service Operations At 794-806 MHz To Show That They Do Not Create Harmful Interference In The RNSS/ARNSS Bands.

GPS operates in an RNSS/ARNSS band in order to ensure that signals used for public safety purposes are protected from harmful interference and disruption. In addition to international protection requirements of ITU Radio Regulations (e.g., S4.10), the protection of GPS signals has been the subject of Congressional legislation which has been signed by the President.^{30/} As a consequence of these considerations, the burden of evidence must reside with those proposing new operations at 794-805 MHz to show that they do not create harmful interference in RNSS/ARNSS bands now used by GPS and GNSS systems. It is not the

^{30/} See H.R. 1702, Commercial Space Act of 1998 and H.R.1119, National Defense Authorization Act for Fiscal Year 1998.