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# WCLA TELECOMMUNICATIONS INC.

July 14, 1999

Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street NW  
Washington, DC 20554

RE: Docket 92-235  
Forest Industries Telecommunication (FIT) Petition for Partial Stay

To the Secretary,

My name is George Kirkmire and I am the Telecommunications Coordinator for the Washington Contract Loggers Association, a trade association representing over 700 independent logging companies and associated industries in Washington State. As part of the many services we provide for our members, WCLA Telecommunications Inc. operates a series of 13 of lowband (below 50 MHz) repeaters located statewide. Our members use these repeaters for safety and business purposes while working in remote, forested areas.

I am writing to you in support of FIT's opposition of the FCC's Second Memorandum Opinion & Order Published in the Federal Register on July 6, 1999. While WCLA Telecommunications Inc. is not currently licensed on any of the frequencies affected by the Second Memorandum Opinion & Order, we are very concerned that we may very well lose our current frequency coordinator, FIT. Allowing the exclusive coordination of the VHF and UHF channels, former Forest Products Radio Service channels and now within the general Industrial/Business pool, by the Petroleum and Power Utilities Radio Service Coordinators will deal a mortal blow to FIT.

I was not aware that it is now the federal government's responsibility to determine who fails and who succeeds within the marketplace. But, unfortunately, that is exactly what will happen if the Second Memorandum Opinion & Order is allowed to stand. A significant block of frequency coordination business will be taken away from FIT and handed over for exclusive coordination by another entity, almost ensuring the demise of FIT.

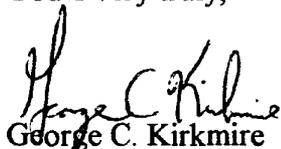
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FIT has for years coordinated the radio frequency spectrum allocated to the forest products industry. They made a successful transition with the implementation of the Refarming Document and had been able to branch out and coordinate frequencies for other industries with the same expertise that they have offered to the forest products industry. Much of that success came about by FIT offering a much more professional service and quicker licensing turnaround time than many of their competitors.

In short, the Second Memorandum Opinion & Order not only creates a monopoly for coordination of frequencies for select coordinators, it also denies me a legitimate choice in who I have available to coordinate my frequencies in the future. I want a coordinator who understands the special needs associated with the forest products industry to coordinate my frequencies. And again, while WCLA Telecommunications Inc. does not have any licenses in the affected frequency range, who is to say that may not be the case in the future, given the pace the FCC is working to Refarm the radio frequency spectrum and sell it to the highest bidder.

Thank you for letting me submit my comments on this matter.

Yours very truly,



George C. Kirkmire  
Telecommunications Coordinator