

RE: WT Docket No. 99-87

Do utilities have different communications needs than the average consumer? Do reliable communications play a vital role in the safe operation of a utility's business? Do the safe operation of utilities impact the public's safety? These are important questions to consider before attempting to auction the PLMR spectrum in the VHF, UHF, and 800MHz frequency bands.

Utilities such as, gas, electric, water, railroads, and petroleum pipelines rely on wireless communications for their day to day business and for the management of emergency situations. Imagine a utility that could not respond to an emergency because they did not have the communications systems available to coordinate a response to a major outage. If utilities were forced to rely on wireless services supplied by public systems such as, cellular, Nextel, and PCS the utilities would be forced to compete for the use of these services during emergencies. As you probably know, the use of these systems increases dramatically during an emergency. This dramatic increase in use of these systems often makes the system unavailable for use. The risk of having these systems becoming unavailable during an emergency, just at the time that communications plays its most vital role, is too great.

Because utilities play such a vital role in the public's safety, I believe that utilities should have their own pool of frequencies, which