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

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In the Matter of)	
)	
Implementation of Sections 309(j) and 337 of the Communications Act of 1934 as Amended)	WT Docket No. 99-87
)	
Promotion of Spectrum Efficient Technologies on Certain Part 90 Frequencies)	RM-9332
)	
Establishment of Public Service Radio Pool in the Private Mobile Frequencies Below 800 MHz)	RM-9405
)	

REPLY COMMENTS OF COLUMBIA ENERGY GROUP

Pursuant to Section 1.415 of the FCC's Rules, Columbia Energy Group hereby submits its Reply Comments in response to the *Notice of Proposed Rulemaking*, released March 25, 1999, in the above-referenced docket. Columbia Energy Group as a transporter of natural gas serving 70 regional distribution companies and distributor of natural gas and petroleum products to 4.2 million retail customers, urges the FCC to protect the availability of spectrum for the critical infrastructure industries such as Columbia Energy Group. Columbia Energy Group supports the position of UTC, and offers the following additional comments in support.

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Introduction

The Columbia Energy Group transports natural gas from the Gulf of Mexico through several states to markets in the mid-west, mid-Atlantic and Northeast. In addition, Columbia Energy Group distributes natural gas to 4 million plus retail customers in five mid-west/mid-Atlantic states as well as other petroleum products to several thousand retail customers. Columbia Energy Group relies extensively on radio communications to maintain safe and reliable operations. This includes supervisory monitoring and control (SCADA) of gas transportation and distribution, dispatch of maintenance and repair crews and corporate management functions. These are essential to safe and reliable delivery of a volatile product.

Maintenance and operations field crews must be in constant communications with dispatchers and management. Public wireless services are not reliable because of limited coverage in rural areas and congestion in metropolitan areas. Therefore, Columbia relies on private radio systems for continuous and reliable communications.

Columbia Energy Group's transmission and distribution affiliates are regulated public service companies and must comply with federal and state regulations. These include the Pipeline Safety Act that requires reliable communications with police, fire and public safety officials in an emergency. Reliable communications necessitates the use of private internal communications systems.

Comments

Incumbent systems in bands affected by auctions must be protected. Columbia affiliates are regulated by state and federal agencies and, as such, their operating costs fall under the scrutiny of these agencies. Radio communications facilities require costly investments and are expected to be reliable and dependable for long life cycles. Investment in private radio facilities is currently estimated at \$50 million. This is the

minimum reinvestment that would be required if we were forced to relocate due to spectrum auctions.

The FCC should allocate channels used by utilities, pipelines and railroads into a new “Public Service Radio Service” as recommended by the UTC, the American Petroleum Institute, and the Association of American Railroads. The usage pattern of utilities, pipelines and railroads is different and sometimes incompatible with certain other industrial/business users. A Columbia affiliate has experienced interference and contention in areas of northern Kentucky where an established frequency was assigned to a hauling company. The hauling company uses the radio intensively at certain times of the day making use by Columbia for gas service operations impossible at those times. Most recently this interference impaired repair efforts on a 4-inch gas line! In certain instances, this interference could have serious health and safety impacts for the public, our customers, and our employees.

Site-by-site licensing should be maintained. Our pipeline affiliates operate in a ribbon arrangement. It would be impractical and wasteful for them to attempt to license their system by geographic areas. Several geographic areas would have to be secured to provide complete coverage. This would be difficult to acquire and would be wasteful for spectrum tied up but not needed in some areas; that would be areas away from the pipeline but within the confines of the licensed geographic area.

Narrowband equipment should not be mandated in the bands above 512 MHz. Within the last ten years we have installed 800 MHz radio systems in certain locations to upgrade and improve operations. These would have to be replaced if narrowbanding was introduced.

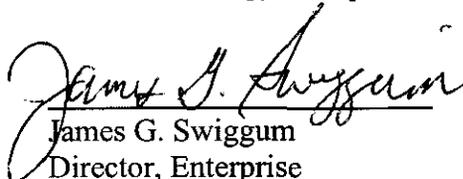
Conclusion

In conclusion, Columbia Energy Group urges the FCC to take action to:

- 1) protect incumbent systems in bands affected by auctions;
- 2) allocate channels used by utilities, pipelines and railroads into a new Public Service Radio Service;
- 3) maintain site-by-site licensing;
- 4) not mandate narrowband equipment in the bands above 512 MHz.

Respectfully submitted,

Columbia Energy Group

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Dated: September 2, 1999

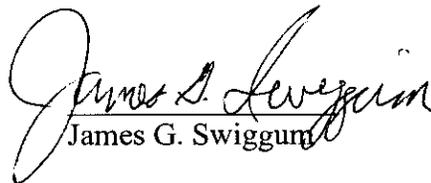
CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing "Reply Comments of Columbia Energy Group" was sent by first-class mail, postage prepaid, to the following persons this 2nd day of September, 1999.

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