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Before The
Federal Communication Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
1998 Biennial Regulatory Review -)
47 C.F.R. Part 90 - Private Land Mobile)
Radio Services)
)
Replacement of Part 90 by Part 88 to Revise)
the Private Land Mobile Radio Services and)
Modify the Policies Governing Them)
and)
Examination of Exclusivity and Frequency)
Assignment Policies of the Private Land)
Mobile Services)

WT Docket No. 98-182
RM-9222

PR Docket No. 92-235

COMMENTS BY GLOBE WIRELESS, INC.

Pursuant to Section 1.415 of the Commission's Rules, Globe Wireless, Inc., through its Attorney, submits the Comment below in response to the Further Notice of Proposed Rulemaking in the above cited proceedings.

I. GENERAL

Globe Wireless is a California Corporation with its headquarters located in Half Moon Bay, California. It operates a high seas worldwide network of High Frequency (HF) telecommunications services in support of the maritime industry. These services are provided by Globe Wireless HF Coast stations at New Orleans, San Francisco, Hawaii, Guam, Chatham and Newfoundland, Canada, and pursuant to special arrangements, by HF Coast stations in other countries. Through its facilities and the use of most modern technologies, HF data, telex, facsimile, and electronics mail services are provided to ships at sea on a global basis.

II. PROPOSAL TO EXPAND USE OF DOCKSIDE FREQUENCIES SUPPORTED

In its Report and Order in the above cited proceeding, the Commission amended Section 90.35(c)(60)(i) of its Rules to allow use of the thirty shore-to-vessel/Dockside frequencies available to Industrial/Business Pool licenses for low power and non-voice communications both for cargo and non-cargo operations.¹ The Commission also decided to require licensees engaged in non-cargo operations to specify permanent sites of operation to promote effective frequency coordination and to minimize interference to cargo operations.

In its Further Notice of Proposed Rulemaking, the Commission seeks comments on an American Automobile Association (AAA) proposal that power restrictions be eliminated on eight of the thirty shore-to-vessel/dockside frequencies and make AAA the sole coordinator of those eight frequencies. AAA would pair those frequencies with Emergency Road Service frequencies with the eight shore-to-ship/dockside being used for mobile units. Globe Wireless supports the expanded use of the eight frequencies involved in the AAA proposal. However, the Commission should insure that AAA is responsible for settling any interference problems that

¹See Order at paragraph 8.

may arise. In its role as coordinator of the eight frequencies to be selected, this should not be a great added burden.

Respectfully submitted,

GLOBE WIRELESS INC.

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Date: November 15, 2000