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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

March 8, 2001

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals, Room TW-A325
445 Twelfth Street, S. W.
Washington, D. C. 20554

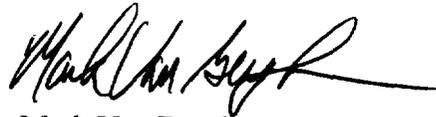
Re: ET Docket No. 00-221
Comments of Fairfield Industries, Inc.
Computer Diskette

Dear Ms. Salas:

Submitted herewith on behalf of Fairfield Industries, Inc. ("Fairfield") is a computer diskette containing a copy of Fairfield's comments in response to the Commission's Notice of Proposed Rule Making in ET Docket No. 00-221, *Reallocation of the 216-220 MHz, 1390-1395 MHz, 1427-1429 MHz, 1429-1432 MHz, 1432-1435 MHz, 1670-1675 MHz, and 2385-2390 MHz Government Transfer Bands*, FCC 00-395, released November 20, 2000. We are concurrently providing a copy of the diskette to the Commission's copy contractor, International Transcription Service, Inc.

Should any question arise concerning this matter please contact Ken Keane of this office (202-775-7123) or undersigned counsel.

Sincerely,



Mark Van Bergh

cc (w/encl.): ITS

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Reallocation of the 216-220 MHz,)	ET Docket No. 00-221
1390-1395 MHz, 1427-1429 MHz,)	RM-9267
1429-1432 MHz, 1432-1435 MHz,)	RM-9692
1670-1675 MHz, and 2385-2390 MHz)	RM-9797
Government Transfer Bands)	RM-9854

COMMENTS OF FAIRFIELD INDUSTRIES, INC.

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Its Attorneys

March 8, 2001

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SUMMARY OF ARGUMENT

Fairfield Industries, Inc. ("Fairfield") herewith submits its comments concerning the Commission's proposed reallocation of the 216-220 MHz band. Fairfield has pioneered in the development, manufacture and use radio telemetry equipment which operates in the 216-220 MHz band and is used in the geophysical exploration for underground oil and natural gas reserves. Maintaining and developing new domestic oil and natural gas supplies is critical to the health of the U.S. economy and is a long established national policy objective. The latest developments in telemetry equipment have dramatically improved the rate at which successful wells are drilled while reducing the impact on the environment.

The 216-220 MHz band already is extensively used or licensed for non-Government services, including the Automated Maritime Telecommunications Service, Interactive Video and Data Service, the Amateur Service and numerous low power services including geophysical telemetry. This severely limits the opportunity for new licensing in the band. Fairfield agrees with the Commission that it must avoid any detrimental impact on incumbent services operating in the 216-220 MHz band.

Fairfield opposes any effort to authorize new, high-power services within this band. Fairfield was forced to move its radio equipment to the 216-220 MHz band because of interference from high powered paging services in the 72-76 MHz band. Allowing new high power uses of the 216-220 MHz band would have a severe adverse impact on geophysical telemetry operations and other low power users of this spectrum with nowhere else to go. Such a loss of service would adversely impact the public which would lose those services. In Fairfield's case, this would mean a reduction in the spectrum available for telemetry operations. This would increase the burden on seismic research and reduce the effectiveness of the exploration for new and expanded oil and natural gas reserves.

If the Commission does not allocate the band for new uses the competitive bidding procedures mandated under BBA-97 for licensing new services would not apply. Additionally, the Commission has already assigned or planned to assign licenses for primary services within the band by competitive bidding. Fairfield agrees with the Commission that this fulfills its obligation under BBA-97. Further, the competitive bidding procedures of Section 309(j) apply only to mutually exclusive applications. By definition, applications for secondary services such as telemetry are not mutually exclusive and are not, therefore, subject to competitive bidding.

The possibility of limiting additional allocations in the 216-220 MHz band to the Fixed Service would not avoid interference as the Commission suggests might occur through facilitated frequency coordination. Such a limitation would simply substitute high-powered uses at fixed locations, such as Regionet proposes for two-way paging, for lower powered mobile locations. Such high power services and the interference they cause are what forced Fairfield to relocate to the 216-220 MHz band. Further, it would remain virtually impossible to coordinate frequency use with LPRS users licensed by rule, itinerant geophysical telemetry users, and other services used in a similar manner.

Finally, Fairfield supports the Commission's proposal to upgrade secondary services in the 216-220 MHz band from secondary to primary status. This would not affect existing primary services in the band. Secondary services operating on 216-220 MHz have harmoniously co-existed with these primary services for years. Upgrading telemetry and LPRS users to primary status could provide them a measure of protection as against subsequent users without unduly burdening existing primary services.

TABLE OF CONTENTS

INTRODUCTION..... 1

THE COMMISSION’S PROPOSALS 5

**NO NEW HIGH-POWER USES OF THE 216-220
MHZ BAND SHOULD BE AUTHORIZED 7**

**AUCTIONS ARE NOT REQUIRED FOR FREQUENCIES
USED FOR GEOPHYSICAL TELEMETRY AND
OTHER SECONDARY SERVICES..... 9**

**RESTRICTING NEW USES TO THE FIXED SERVICE
WILL NOT SUFFICIENTLY PROTECT INCUMBENT USERS..... 10**

**THE COMMISSION SHOULD ELEVATE SECONDARY
SERVICES TO PRIMARY STATUS..... 12**

CONCLUSION 13

**Before the
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Washington, DC 20554**

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Government Transfer Bands)	RM-9854

To: The Commission

COMMENTS OF FAIRFIELD INDUSTRIES, INC.

Fairfield Industries, Inc., (“Fairfield”), by its counsel, hereby submits its comments in response to the Commission’s Notice of Proposed Rule Making in the above-captioned proceeding (the “*NPRM*”), FCC 00-395, released November 20, 2000.¹ In the *NPRM* the Commission proposes to allocate 27 megahertz of spectrum in certain bands transferred from Government to non-Government use pursuant to the Omnibus Budget Reconciliation Act of 1993 (“*OBRA-93*”) and the Balanced Budget Act of 1997 (“*BBA-97*”). These comments focus on the Commission’s proposed allocation of the 216-220 MHz band.

INTRODUCTION

Fairfield is a Houston, Texas-based company engaged in all phases of geophysical exploration for oil and natural gas, including data acquisition, data processing and instrument design and manufacture. Fairfield’s clients include most major and independent oil and gas producers. The company’s domestic exploration activities are concentrated in shallow waters in

¹ By *Order Granting Extension of Time*, DA 01-451, released February 16, 2001, the Chief, Office of Engineering and Technology, extended the time for filing comments in this proceeding until March 8, 2001.

the Gulf of Mexico (up to 30 miles offshore) and remote areas such as Alaska's North Slope and Louisiana swamps.

Fairfield has pioneered in the development, manufacture and use of radio telemetry equipment to perform geophysical exploration for underground oil and natural gas reserves. Fairfield's type-accepted telemetry equipment is designed to operate in the 216-222 MHz bands and is marketed under the trade name BOX – THE SEISMIC DATA NET®.

In the operation of the BOX® data acquisition equipment, a sound source (such as a small explosive charge) is used to introduce seismic energy into the earth's surface. The reflected energy is picked up by geophones or hydrophones (sensors for land and water exploration, respectively). This data is then transmitted simultaneously from each sensor location via low-power AM radio signals to a high-gain Yagi antenna which in turn is connected to a very sensitive receiver. The data is transmitted in short bursts, usually no more than 30 seconds every three minutes or so. Each transmitter operates on a separate channel at very low power (no more than two watts) with an effective antenna height that does not exceed two meters.

Before the introduction of radio telemetry equipment, hard-wired telemetry equipment required physically connecting each measurement sensor to the central receiver. Because each sonic event (or "shot") requires the use of approximately 2,000 separate measurement locations, use of hard-wired technology resulted in slow, cumbersome and expensive tests which often had severe limits on the size of the geographic area studied. Fairfield's radio telemetry equipment eliminates the need to hard-wire each sensor to the central receiver and allows the deployment of more sensors over a larger area. This improves the quantity and quality of the data received, reduces the cost of each test, and is more environmentally protective (reducing crew movements

to and from hard-wired sensors is particularly important in environmentally sensitive areas such as tidal wetlands).

In a typical seismic research study, the transmitters are moved from point to point along surveyed lines usually several miles in length. After data is collected in one area, the entire system is moved to the next survey area and the process is repeated. Because each member of an exploration crew typically carries more than one BOX® remote unit at one time, the transmitters must be readily portable and rugged. This means that the transmitting apparatus and battery supply are as small and light-weight as possible. The size and weight limits require low output power transmitters. The need for light, portable transmitters that operate at very low power levels makes operation below 300 MHz essential. The superior propagation characteristics of this spectrum helps off-set the reduced operating range that results from the low power operation.

Because the central receiving unit must be extremely sensitive in order to receive the low power transmissions, and because the measurements require accurate, uncontaminated data, geophysical telemetry operations are highly susceptible to interference from other uses of the same or adjacent channels. Thus, prior to beginning any measurements the spectrum is monitored to determine those channels on which other signals are present. These channels and the two adjacent channels are unusable for tests in that area, *i.e.* the operation is self-policing. Frequently, interference and other spectrum uses preclude the use of 40, 60 or even 80 channels in a given area.

Fairfield also has developed and implemented the use of three-dimensional ("3-D") survey techniques in shallow offshore waters. This technique has significantly improved the quality and resolution of seismic surveys compared to previous two-dimensional ("2-D") survey methods. 3-D surveys provide a dramatic improvement in the rate at which successful wells are

drilled: At least one major U.S. oil and natural gas producer has reported a 63 percent improvement. However, 3-D survey techniques require the use of more sensors and transmitters placed at closer intervals, thereby increasing the number of channels required for each survey. The U.S. Department of Energy (“DOE”) has specifically recognized the important role that 3-D technology plays in developing and advancing domestic oil and natural gas production while protecting the environment and creating high-paying employment opportunities.²

Most recently Fairfield has developed a 3D shallow water data acquisition technique that uses four sensors where previously only one sensor was used. These sensors measure shear waves as well as compressional and pressure waves. Converted shear wave data provides additional vital information to help interpreters “see” oil and gas related features that previously were hidden from compressional data alone.³ This technique requires approximately four times as much data acquisition compared with the conventional 3D survey recording only compressional waves.

In 1994, Fairfield petitioned the Commission to allow the use of the 220-222 MHz band for geophysical telemetry, in addition to the 216-220 MHz band then in use. Although

² See *The Domestic Natural Gas and Oil Initiative: Energy Leadership in the World Economy*, Department of Energy (December 1993). “[M]odern natural gas and oil exploration and production represent the quintessential ‘high tech’ industry. For example, technologies that use state-of-the-art computer mapping of the subsurface for exploration and production are being enhanced through further development in the natural gas and oil industry today. A case in point is known as three-dimensional (3-D) seismic surveying. This procedure provides high-resolution images of subsurface natural gas and oil deposits, thus enabling more efficient and environmentally sound exploration and development resulting in increased reserves and fewer dry holes.” (Page 2) “By encouraging the use of the most advanced technologies for natural gas and oil production and environmental compliance, these actions bolster progress toward the creation of high-wage employment for U.S. citizens.” (Page 7) “Other case studies suggest that where new undrilled reservoir prospects lie adjacent to producing fields, 3-D technology can improve the discovery success rate by as much as 50 percent.” (Page 8).

³ See John Norton and Rob Windels, *Seismic Acquisition Advances Put Subsurface In Focus*, THE AMERICAN OIL & GAS REPORTER (April 1999).

Fairfield's radio equipment was originally designed to operate in the 72-76 MHz band, interference from high-powered paging transmitters forced Fairfield to move to 216-220 MHz for geophysical telemetry. However, as Fairfield noted in its 1994 Petition, the 216-220 MHz band has become more congested with Automated Maritime Telecommunications Service ("AMTS") users, and allocations for interactive video data services.⁴ The Commission found that Fairfield's request would serve the public interest and authorized the use of the 220-222 MHz band for geophysical telemetry.⁵

THE COMMISSION'S PROPOSALS

In this rule making, the Commission proposes to allocate 27 megahertz of spectrum transferred from Government to non-Government use, including the 216-220 MHz band. The Commission has acknowledged, however, that "the 216-220 MHz band is already used extensively for non-Government services, which will limit the opportunities for new licensing in the band, even after Government services vacate this spectrum." *NPRM* at para.11. These non-Government operations include Interactive Video and Data Service ("IVDS") (which the Commission has already auctioned)⁶, the Amateur Service, and AMTS (which uses both the 217-218 MHz and 219-220 MHz segments along the coastlines and inland waterways, including the coast of the Gulf of Mexico). The Commission also has authorized "the entire 216-220 MHz band for Fixed Service, Aeronautical Mobile Service and Land Mobile Service on a secondary basis for telemetering and associated telecommand operations, such as gas pipeline data

⁴ See Petition for Rulemaking, filed June 8, 1994, In the Matter of Amendment of Part 90 of the Commission's Rules Regarding Seismic Telemetry.

⁵ See *In the Matter of Amendment of Part 90 of the Commission's Rules to Provide for the Use of the 220-222 MHz Band by the Private Land Mobile Radio Service, Third Report and Order; Fifth Notice of Proposed Rulemaking*, 12 FCC Rcd 10943, 11009-11012 (1997).

⁶ See *NPRM*, footnote 19.

collection and remote monitoring of vehicle performance testing.” *Id.* at para. 10. Other authorized uses include airborne wildlife telemetry and the low power radio service, including auditory assistance devices, health care aids and law enforcement tracking systems.

The Commission has stated that any new primary service allocations in the 216-220 MHz band will have to protect existing primary licensees, including AMTS and IVDS licensees. *NPRM* at para. 15. Additionally, because the band is adjacent to the 210-216 MHz band used for television Channel 13, the need to protect Channel 13 operations will likely constrain any new uses of the 216-220 MHz band. *Id.* at para. 11. Most importantly, the Commission has expressed concern about protecting the viability of incumbent non-Government services within the band which, while not authorized on a primary basis, nonetheless serve important public needs. *Id.* at para. 12.

The NPRM raises several issues of concern to Fairfield:

1) *Authorization of New Services.* The Commission raises the question whether the 216-220 MHz band has the capacity to accommodate any additional services beyond those currently authorized, and if it is to authorize additional services, how it should assign those licenses. Potential new services could include high-power operations such as paging, which could cause significant disruption to low power users like Fairfield.

2) *Use of Auctions.* Under BBA-97, the 216-220 MHz band is to be re-designated from shared Government and non-Government use to mixed Government and non-Government use. This raises the question as to whether the Commission must award licenses for 216-220 MHz using the competitive bidding procedures described in Section 309(j) of the Communications Act. The Commission has previously auctioned the 218-219 MHz segment, and recently

proposed to auction remaining AMTS licenses in the 217-218 MHz and 219-220 MHz bands.⁷ The Commission believes this meets the statutory requirement and asks for comments.

3) *Limiting Additional Allocations in the 216-220 MHz Band to Fixed Service.* The Commission requests comment on whether limiting new allocations to Fixed Services would facilitate frequency coordination and minimize interference to incumbent users.

4) *Elevating Secondary Users to Primary Status.* The Commission requests comment on the possibility of elevating telemetry and other low power services to primary status.

Each of these issues is addressed below.

NO NEW HIGH-POWER USES OF THE 216-220 MHZ BAND SHOULD BE AUTHORIZED

Although the Commission proposes generally to allocate the 216-220 MHz band to the Fixed and Mobile Services, it should not authorize any new high-power services within the band. The Commission appropriately recognizes the need “to avoid any detrimental impact on the many valuable incumbent services operating in this spectrum, including auditory assistance devices, the LPRS, the Amateur Service, and telemetry.” NPRM at para. 17. These low power services, and Fairfield’s geophysical telemetry in particular, are extremely susceptible to interference. As noted above, AMTS operations along the Mississippi and other waterways of the Gulf Coast region frequently preclude the use of numerous channels for geophysical telemetry in any given location.

Most low-power services, including geophysical telemetry, operate at 216-220 MHz because they are no longer able to operate in other frequency bands. Fairfield was forced to move its radio equipment to 216-220 MHz because of interference from high powered paging in

⁷ See *Amendment of the Commission’s Rules Concerning Maritime Communications, Fourth Report and Order and Third Notice of Proposed Rule Making*, PR Docket No. 92-257, FCC 00-370, released November 16, 2000.

the 72-76 MHz band. Similarly, because of the extensive use of the 216-220 MHz band, Fairfield found it necessary to request, and the Commission found it in the public interest to allow, geophysical telemetry in the 220-222 MHz band.

Allowing new high power uses of the 216-220 MHz band would have a severe impact not just on existing low power users of this spectrum with nowhere else to go, but also on the public which would lose those services. Maintaining and developing new domestic natural gas and oil supplies are critical to the health of the U.S. economy. National policy has long favored the location and development of new energy reserves.⁸ The Bush Administration has announced a number of new initiatives for this purpose.⁹ The Department of Energy has specifically recognized the important role that geophysical telemetry, and particularly 3-D technology such as Fairfield's, has had and will continue to have in significantly improving the nation's ability to locate new energy reserves, and doing so in a more environmentally safe manner.¹⁰

The end result of allowing high power operations in the 216-220 MHz band, such as two-way paging, would be an increase in interference to channels used for geophysical telemetry. This would reduce the spectrum available for telemetry operations, increase the burden on geophysical explorations, and reduce the effectiveness of the exploration for new and expanded oil and natural gas reserves. Such an impact on the long-standing national policy to locate and develop domestic energy reserves is contrary to the public interest.

⁸ See *The Domestic National Gas and Oil Initiative, supra*.

⁹ See e.g., "US May Open Section of Rockies to Drilling," *Washington Post*, February 13, 2001, page A13; "Norton Making Case for Oil Drilling," *Washington Post*, February 13, 2001 (Internet article at www.washingtonpost.com).

¹⁰ See footnote 3, *supra*, and related text.

**AUCTIONS ARE NOT REQUIRED FOR FREQUENCIES
USED FOR GEOPHYSICAL TELEMETRY
AND OTHER SECONDARY SERVICES**

As discussed above, the Commission has tentatively concluded not to authorize any new primary services in the 216-220 MHz band due to the lack of capacity and the adverse impact on existing services. *NPRM* at para. 15. Fairfield supports this conclusion. Assuming the Commission does not allocate the 216-220 MHz band for new uses, then the BBA-97 requirement to auction the “transferred” frequencies would not apply.

Additionally the Commission already has assigned IVDS licenses in the 218-219 MHz band, in part, by auction, and has proposed auctioning the remaining AMTS licenses in the 217-218 MHz and 219-220 MHz bands. *NPRM* at para. 15. Thus, the Commission has designated or proposes to designate for assignment by auction three of the four megahertz within the 216-220 MHz band. Fairfield agrees with the Commission’s tentative conclusion that this fulfills its obligation under BBA-97.

Moreover, Section 309(j) is not absolute in requiring the use of competitive bidding for all licensing activities. Section 309(j) applies only to mutually exclusive applications.¹¹ By definition, mutually exclusive applications require exclusive use of a proposed channel or frequency band. When use is not exclusive, such as services which share spectrum or are licensed by rule, those services are not mutually exclusive and competitive bidding is not required. Geophysical telemetry operations are licensed on a secondary, shared-use basis, with no exclusive licenses issued for specific frequencies or geographic areas. Thus, applications for

¹¹ “If ... mutually exclusive applications are accepted for any initial license or construction permit, then, except as provided in paragraph (2), the Commission shall grant the license or permit to a qualified applicant through a system of competitive bidding that meets the requirements of this subsection.” 47 U.S.C. Section 309(j)(1).

the service are not mutually exclusive with any other applications and not subject to competitive bidding. The same is true for many of the other secondary services in the 216-220 MHz band.

Insofar as auctions for new services are concerned, Section 309(j) requires the Commission, in identifying which classes of licenses and permits to issue using competitive bidding, to “include safeguards to protect the public interest in the use of the spectrum” and to promote certain objectives which include “the development and rapid deployment of new technologies, products, and services for the benefit of the public,” and the “efficient and intensive use of the electromagnetic spectrum.” 47 U.S.C. Section 309(j)(3)(A) and (D). Geophysical telemetry, and its development and application in 3-D seismic research, represents the type of “new technolog[y], product[] and service[]” that benefits the public as contemplated in Section 309(j)(3)(A). The need to locate and develop new energy resources is of vital national interest. Further, because geophysical telemetry can co-exist with other low power users of the spectrum -- but not with high power operations -- it represents an “efficient and intensive use” of the spectrum under Section 309(j)(3)(D). BBA-97 does not require the Commission to sacrifice the viability of geophysical telemetry or other authorized users of the 216-220 MHz band to make room for a few new assignments potentially licensable by competitive bidding on an overlay basis.

**RESTRICTING NEW USES TO THE FIXED SERVICE WILL NOT SUFFICIENTLY
PROTECT INCUMBENT USERS**

The Commission suggests that, if it limited any additional allocations in the 216-220 MHz band to the Fixed Service, it might facilitate frequency coordination with incumbents and thus avoid interference. The Commission also requests comment on Regionet’s proposal to reallocate the 218-219 MHz band from the IVDS (now 218-219 Service) to the Paging and

Radiotelephone Service so as to provide more spectrum for two-way paging. *NPRM* at para. 17; *see also* Petition for Rule Making, filed June 10, 1999, by Regionet Wireless License, LLC.

Limiting new allocations to the Fixed Service will do little to reduce the potential for interference to incumbent users, particularly those currently authorized as secondary service providers. It would simply substitute high-powered uses at fixed locations for lower powered mobile locations. While a Fixed Service allocation might facilitate coordination between new and existing services, it would remain virtually impossible to coordinate frequency use with LPRS users, who are licensed by rule rather than location; geophysical telemetry uses which, while licensed, are itinerant in nature; and other services used in a similar manner.

The Commission does not suggest the power limitations it would place on new Fixed Service operations. Regionet, on the other hand, proposes to use the 218-219 MHz band for base station transmissions up to 1000 watts effective radiated power.¹² That represents an almost six fold increase from the current IVDS maximum permitted effective radiated power of 20 watts.¹³ Although Regionet submitted studies of television receivers to show that its proposal would not adversely impact the reception of Channel 13, or NTSC television in general,¹⁴ Regionet did not address the adverse impact its high-power proposal would have on existing services operating in the 216-220 MHz band.¹⁵

As previously discussed, Fairfield had to move to the 216-220 MHz band because of interference from high-power paging, such as Regionet now proposes. Fairfield also sought and obtained Commission authorization to use the 220-222 MHz band because of existing operations

¹² Regionet also proposes that the Commission amend its LPRS rules to allow paging response transmitters in the 216-217 MHz band.

¹³ *See* 47 C.F.R. Section 95.855(a).

¹⁴ Regionet's studies did not address the potential impact on reception of DTV transmissions.

(particularly AMTS) in the 216-220 MHz band which increasingly limited its ability to aggregate the hundreds of clear channels required for 3D geophysical operations. Allowing new, high-powered fixed services, whether in the form of Regionet's proposed two-way paging base stations, or other such services, would have equally severe consequences for geophysical telemetry and other low power users in this band. Thus, new high power operations should not be allowed.

THE COMMISSION SHOULD ELEVATE SECONDARY SERVICES TO PRIMARY STATUS

Although AMTS and IVDS currently enjoy primary status within the 216-220 MHz band, there are numerous other services that serve important public needs, but which have secondary status. The Commission specifically cited telemetry, auditory assistance devices and the Amateur Service as examples. *NPRM* at para. 17. The Commission requests comment on elevating these and other secondary services to primary services. *Id.* at paras. 16-17. Fairfield supports the Commission's proposal, particularly as it would apply to telemetry.

Upgrading secondary services in the 216-220 MHz band to primary status need not impact those primary users already authorized. Existing users would receive continued protection from "upgraded" services under the first-in-time principle. That is, "among services of equal allocation status, the first licensed is generally entitled to protection from the later licensed." *NPRM* at para. 15. As a practical matter, the secondary, low power services in the 216-220 MHz band have harmoniously co-existed with the current primary services for years. The self-policing characteristics of Fairfield's telemetry equipment ensures that it will not interfere with other users of the spectrum. *See supra* at 3.

¹⁵ Channel 13 uses the 210-216 MHz band.

At the same time, if primary status for telemetry/LPRS users is applicable only as against subsequent users (or simply as against user classes other than AMTS and IVDS), a measure of protection for upgraded telemetry and LPRS operations would be provided without being unduly burdensome. In upgrading telemetry and LPRS the Commission need not alter the licensing of telemetry equipment under Part 90 of the rules. Geophysical telemetry is typically licensed on an area basis due to its itinerant nature. Likewise, such operations are able to take advantage of frequency flexibility within the band. Maintaining this flexibility is important for the continued co-existence of these services. Provided the Commission does not authorize new, high-power users in the 216-220 MHz band, these services can continue harmonious co-existence with primary services. At the same time, a primary allocation will provide a significant measure of protection as against any proposals for entry by new high power operations.

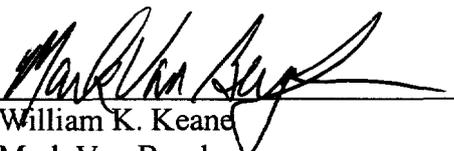
CONCLUSION

The Commission's tentative conclusion that it is inappropriate to authorize new, co-primary services in the 216-220 MHz band is correct. Existing services already heavily occupy the band, leaving little room for new allocations. *NPRM* at para. 14. The Government is not a heavy user of the band resulting in little additional capacity from the transferred Government spectrum. Additionally, numerous incumbent secondary services provide important public services in the 216-220 MHz band. The allocation and assignment of the band for new high-power services would jeopardize these services.

For the foregoing reasons, Fairfield urges the Commission not to make any new service allocations in the 216-220 MHz band, and not to hold an auction for the band.

Respectfully submitted,

FAIRFIELD INDUSTRIES, INC.

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