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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

MAR - 8 2001

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
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**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**

ET Docket No. 00-221
RM-9267
RM-9692
RM-9797
RM-9854

To: The Commission

COMMENTS

Automobile Club of Hartford, Inc. ("AAA Hartford") applauds the Commission's efforts, in the above-captioned proceeding, to accommodate private radio use in designing its plan to reallocate 27 megahertz of spectrum from Government to non-Government use. AAA Hartford is a not-for-profit organization that has been providing emergency road services for decades.

Over the course of a year, AAA Hartford responds to hundreds of thousands of emergency road service calls from motorists facing a wide variety of problems, many of which endanger the safety of drivers and their passengers, as well as other motorists. Relying on the efficient use of its radios and the private radio spectrum, AAA Hartford quickly dispatches towing operations to the scene of motor vehicle accidents or breakdowns, so that road hazards can be cleared before secondary collisions occur. AAA Hartford also assists motorists who are stranded or involved in accidents, and transports them from roads and highways where they may otherwise be vulnerable to harm from high-speed vehicles, severe winter weather or crime.

AAA Hartford is the licensee of numerous radio systems within its area of responsibility and is

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constantly licensing new radio systems and modifying existing systems so that it may provide the most efficient and reliable emergency road services to its members. The area in which AAA Hartford operates is characterized by mountains, coastal areas, inland areas, as well as densely populated urban areas, making it a challenge to provide reliable communications in these diverse areas. Spectrum is scarce throughout the New York/New England portion of the Eastern Seaboard. In addition, AAA Hartford's area of operation is often affected by severe winter weather conditions, creating tremendous increases in the volume of radio traffic during storms.

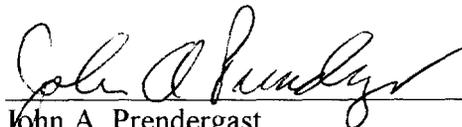
AAA Hartford supports a reallocation plan that would make additional spectrum available for its use and/or the use of its affiliated emergency road service workers. Specifically, AAA Hartford supports the allocation options (such as Land Mobile Communications Council's proposal for the 1390-92 and 1427-29 MHz bands) that would forego entirely the use of auctions for the assignment of at least a portion of the reallocated spectrum. The Commission can fulfill its mandate and avoid mutual exclusivity of applications for spectrum by using the frequency coordination program that has served the land mobile industry well for many years.

AAA Hartford recognizes that there are many conflicting interests competing for access to spectrum, but wishes to remind the Commission of the valuable service that AAA Hartford and other private users provide to the public. Spectrum is vitally important to AAA Hartford's ability to serve its customers, and as Connecticut continues to grow in population, AAA Hartford can forecast the need for additional spectrum, especially in the larger population centers. Therefore, the allocation of spectrum for coordinated, site-by-site licensing to private users will serve the public interest.

AAA Hartford recognizes that a portion of the band to be reallocated (1432-1435 MHz) must be auctioned. For this portion of the spectrum, AAA Hartford supports LMCC's proposal that the frequencies be auctioned to band managers who would be required to lease the spectrum to private users, rather than commercial licensees. The Commission has recently made large amounts of spectrum available for commercial operations, in the Personal Communications Service, Specialized Mobile Radio, Public Coast and other auctions. More auctions of commercial spectrum are already scheduled. The relatively small amount of spectrum available in this proceeding should be reserved for the well-documented needs of private users.

In sum, AAA Hartford again applauds the Commission's efforts to reallocate spectrum from Federal Government to non-Government use, and respectfully requests that the Commission, in making its reallocation, keep in mind the interests of the millions of people served daily by emergency road services and other private users.

Respectfully Submitted,

By 
John A. Prendergast
Kathleen A. Kaercher
Blooston, Mordkofsky, Dickens, Duffy & Prendergast
2120 L Street, NW, Suite 300
Washington, DC 20037
(202) 659-0830

Attorneys for Automobile Club of Hartford, Inc.

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