

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Revisions to Rules Authorizing the Operation of Low Power Auxiliary Stations in the 698-806 MHz Band)	WT Docket No. 08-166
)	
Public Interest Spectrum Coalition, Petition for Rulemaking Regarding Low Power Auxiliary Stations, Including Wireless Microphones, and the Digital Television Transition)	WT Docket No. 08-167
)	

**COMMENTS OF ST. CLAIR COUNTY, ILLINOIS
EMERGENCY TELEPHONE SYSTEM BOARD**

The Emergency Telephone Systems Board (“ETSB”) of St. Clair County, Illinois hereby comments on the Notice of Proposed Rulemaking, FCC 08-188, released August 21, 2008 (“Notice”). ETSB is the administrator for the County of a license to use 700 MHz frequencies for emergencies in the County and during multijurisdictional tactical operations involving public safety responders. As of August 30, 2007, there were 1347 radios on the system capable of 700/800 MHz operation.

ETSB strongly supports the Notice’s tentative conclusion (at ¶13)

to revise our rules to prevent operation of low power auxiliary stations in the 700 MHz Band, and thus avoid potential disruption to new public safety and other services in that Band after DTV transition.

The County, along with the entire State of Illinois, is affected by the interference potential arising, among other ways, from operations of a television producer whose broadcast auxiliary license is mentioned at ¶7 of the Notice.

ETSB is pleased to note that the Society of Broadcast Engineers (“SBE”) “is generally supportive of the Commission’s proposal to exclude LP Aux[iliary] devices from the 700 MHz band after the transition.” SBE goes on to explain:

There is potential incompatibility between continued WM [wireless microphone] operation at 700 MHz and the commencement of Public Safety uses of the 700 MHz band. Public Safety requires a high degree of reliability, and LP Aux operation above 698 MHz, which is unpredictable, mobile and itinerant, is difficult to justify after the change in spectrum allocation. SBE, which has for years provided volunteer frequency coordination services for users of BAS spectrum, could not comfortably coordinate Part 74 licensed BAS operation of LP Aux devices in the 700 MHz band once Public Safety operations begin in that band in earnest.

For the reasons discussed above, ETSB asks that the Commission make final the tentative conclusion to preclude low power auxiliary stations from the 700 MHz band.

Respectfully submitted,

ST. CLAIR COUNTY, ILLINOIS

By _____/s/_____

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