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

In the Matter of	)	
	)	
Amendment of the Commission's Rules	)	WT Docket No. 04-344
Regarding Maritime Automatic	)	
Identification Systems	)	
	)	

PETITION FOR RECONSIDERATION OF PACIFICORP

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Dated: March 2, 2009

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EXECUTIVE SUMMARY

PacifiCorp hereby petitions for reconsideration of two aspects of the Commission's *Second Report and Order*, FCC 08-208, released September 19, 2008, in this matter. First, PacifiCorp respectfully requests the Commission to revise the grandfathering rights for incumbent licensees on VHF Public Coast (VPC) Channel 87 in circumstances where it will not be possible for the Channel 87 licensee to make a seamless transition to replacement Channels 84 or 85 due to the presence of other grandfathered licensees on those channels. Under the rules as adopted, there could be up to a 13-year gap between a VPC licensee's relinquishment of Channel 87 and its ability to access replacement Channel 84 or 85. This delay in securing replacement spectrum is unprecedented.

Second, PacifiCorp requests the Commission to provide relief for VPC licensees who will suffer a net loss of spectrum because of inability to use both of the interstitial channels associated with replacement Channels 84 and 85. PacifiCorp recommends that the Commission revise the 12.5 kHz bandplan for inland VPCSAs so that licensees may divide an existing 25 kHz channel into two 12.5 kHz channels. While PacifiCorp believes this would provide the optimal solution, an alternative would be to allocate to Public Safety the interleaved channel between Channel 84 and 25 (commonly referred to as Channel 284), as well as the 12.5 kHz channel centered in VPC Channel 25 (commonly referred to as Channel 425) in all of the inland VPCSAs in lieu of Channel 25.

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PETITION FOR RECONSIDERATION

Pursuant to Section 405 of the Communications Act of 1934, 47 U.S.C. §405, and Section 1.429 of the Commission's Rules, 47 C.F.R. §1.429, PacifiCorp hereby petitions for reconsideration of two aspects of the Commission's *Second Report and Order*, FCC 08-208, released September 19, 2008, in the above-captioned matter (*Second R&O*).[1] As explained herein, PacifiCorp respectfully requests the Commission to revise the grandfathering rights for incumbent licensees on VHF Public Coast (VPC) Channel 87 in circumstances where it will not be possible for the Channel 87 licensee to make a seamless transition to replacement Channels 84 or 85 due to the presence of other grandfathered licensees on those channels. PacifiCorp also requests the Commission to provide relief for VPC licensees who will suffer a net loss of spectrum because of inability to use both of the interstitial channels associated with replacement Channels 84 and 85.

[1] The *Second R&O* was published in the Federal Register on January 29, 2009 (74 Fed.Reg. 5117).

I. Introduction

PacifiCorp is licensed on VPC spectrum in VPCSAs 27, 28, 31, 32, 33, 35, and 37, which are inland VPCSAs and currently include the authority to operate on channel 87.[2] As explained in PacifiCorp's Reply Comments in this proceeding, PacifiCorp made significant investment in VPC spectrum, and was granted certain waivers of the Commission's Rules, so that PacifiCorp could incorporate these channels into the private land mobile radio system it operates in support of its electric utility operations.[3] PacifiCorp relies on its extensive and complex private communications system every day, across its entire service area, to protect its employees while they are performing often-dangerous work and to maintain the safety and reliability of its electric network and each of the networks to which PacifiCorp is interconnected.

PacifiCorp utilizes the VHF high-band for much of its critical operations due to the propagation characteristics needed to cover its diverse territory in the Pacific Northwest. The majority of this territory is sparsely populated, yet PacifiCorp has a public interest mandate to provide these areas with reliable electric service. Wide area coverage is essential given the limited number of frequencies available for this kind of operation, as well as the limited number of radio transmission sites available in the mountainous terrain covering much PacifiCorp's operating territory. PacifiCorp therefore submitted

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[2] See Call Signs WPOJ517, WQAA636, WPOJ518, WPOJ519, WPOJ520, WPOJ522, and WQAA637, respectively.

[3] *Wireless Telecommunications Bureau Assignment of Authorization and Transfer of Control Applications Action*, Public Notice, Report No. 1756, File No. 0001554439 (rel. Feb. 25, 2004).

Reply Comments in this proceeding to address the potential reallocation of channel 87 to AIS and the need for the Commission to provide an adequate replacement channel.

II. The Commission Should Modify the Grandfathering Rights of Incumbents on Channel 87 to Provide for a Seamless Transition to Replacement Channels

In the *Second R&O*, the Commission reallocated VHF maritime Channel 87B for AIS in the inland VPCSAs in order to permit expansion of AIS to areas far removed from coastal waters. The Commission also reallocated certain channels currently reserved for public safety interoperability in the inland VPCSAs for VPC use to make up for the loss of channel 87 in these areas.

In its earlier comments in this proceeding, PacifiCorp stated that its primary concern was that the Commission not take any action in this proceeding that would limit or diminish the ability of VPC licensees to use this spectrum without interference. PacifiCorp pointed out that reallocation of Channel 87B for AIS in the inland VPCSAs would materially and negatively impact PacifiCorp because PacifiCorp is licensed to operate on Channel 87B in a number of inland VPCSAs.[4] With so few channels available, loss of even one 25 kHz channel will have a significant and detrimental impact on PacifiCorp's ability to meet its private land mobile communications requirements. PacifiCorp therefore urged the Commission to assign to VPC licensees suitable replacement spectrum having the same propagation and operating characteristics. PacifiCorp suggested that the Commission could reallocate Channels 84 and 85 for VPC use because there has been very little use made of these channels by public safety

licensees for "interoperability purposes." PacifiCorp noted that with the significant amount of spectrum that has been allocated in recent years for public safety applications, it is understandable why public safety has not shown much interest in using these 25 kHz set-aside channels in the VHF band for interoperability purposes.[5]

In the *Second R&O*, the Commission agreed that replacement channels should be made available for VPC licensees that will lose access to Channel 87B, and it adopted PacifiCorp's recommendation that Channels 84 and 85 should be allocated as the replacement channels. The Commission noted that Public Safety services have been allocated a significant amount of new spectrum for interoperability purposes in the last few years, and it effectively agreed with PacifiCorp's position that public safety will not be compromised by reallocating one channel in each inland VPCSA to non-public safety use. PacifiCorp is therefore pleased that the Commission will provide replacement channels to inland VPC licensees to make up for the loss of Channel 87B.

However, in adopting the grandfathering and transition requirements, the Commission significantly undermined the ability of certain geographic area licensees on VPC Channel 87, such as PacifiCorp, to make a seamless transition to replacement Channels 84 and 85. The Commission provided in the *Second R&O* that incumbent site-

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[4] *See* Reply Comments of PacifiCorp filed in WT Docket No. 04-344, on November 27, 2006, at 4-5.

[5] *See, e.g.,* The Development of Operational, Technical and Spectrum Requirements For Meeting Federal, State and Local Public Safety Agency Communication Requirements Through the Year 2010, *First Report and Order and Third Notice of Proposed Rulemaking*, 14 FCC Rcd 152 (1998) (24 MHz of spectrum at 700 MHz allocated for Public Safety); and The 4.9 GHz Band Transferred from Government Use, *Second Report and Order and Further Notice of Proposed Rulemaking*, WT Docket No. 00-32, FCC 02-47 (released February 27, 2002) (allocating 50 MHz of bandwidth at 4.9 GHz for Public Safety).

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based licensees on Channels 84 and 85 may continue to operate on those channels for 15 years from the effective date of the rules adopted in the *Second R&O*; *i.e.*, until March 4, 2024.[6] However, the Rules as adopted also require all inland VPCSA licensees operating on Channel 87B to vacate that channel by March 2, 2011.[7]

This means that while PacifiCorp must vacate Channel 87B in its inland VPCSAs by March 2, 2011, it will not have access to replacement Channels 84 and 85 in some areas until 13 years later because of the grandfathered use of those channels by incumbent site-based licensees. For example, the State of Wyoming holds a number of site-based authorizations for Channels 84 and 85 that will effectively preclude PacifiCorp's operating on replacement Channel 85 anywhere within VPCSA 27 and on replacement Channel 84 in a major portion of VPCSA 31 until March 4, 2024, unless the State of Wyoming voluntarily vacates its use of Channels 84 and 85 at an earlier date. PacifiCorp therefore requests reconsideration of these grandfathering and transition provisions to permit PacifiCorp, and similarly situated licensees, an opportunity to make a seamless transition to replacement channels.

When incumbent licensees are forced to relocate to new spectrum, it has been the Commission's long-standing policy to provide the incumbent licensees with replacement spectrum and to establish procedures that ensure a seamless transition to that replacement

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[6] See Section 90.20(g)(2)(ii) of the Commission's Rules, as revised in the *Second R&O*, 74 Fed. Reg. at 5126.

[7] See Section 80.371(c), note 3, as revised in the *Second R&O*, 74 Fed.Reg. at 5125.

spectrum. It is unprecedented for the FCC to require an incumbent licensee to wait 13 years for replacement spectrum, as it has done here.

The FCC adhered to this fundamental principle of facilitating a seamless transition to comparable facilities when it designated the 2 GHz band for the licensing of new telecommunications technologies, such as Personal Communications Services (PCS) and Advanced Wireless Services (AWS). In 1992, the FCC issued a *First Report & Order* providing for the redeployment of 220 MHz of 2 GHz spectrum for use with new telecommunications technologies and adopting a transition plan for relocating the incumbent 2 GHz licensees.[8]

Under the transition plan, the FCC allocated a number of higher frequency bands for the incumbent operations and established negotiation procedures between new and incumbent 2 GHz licensees. To the extent that an agreement could not be reached between the parties, the new licensee could involuntarily relocate the incumbent if the new licensee provided the incumbent with comparable facilities at a new frequency. An incumbent 2 GHz licensee was not required to relocate from its existing frequencies "until the comparable alternative facilities [were] available to it for a reasonable time to make adjustments and ensure a seamless handoff."[9] The FCC said it would work with the National Telecommunications Information Association (NTIA) to create a "safety net" for incumbents who could not reliably use non-government frequencies in higher

[8] Redevelopment of Spectrum to Encourage Innovation in the Use of New Telecommunications Technologies, *First Report and Order and Third Notice of Proposed Rule Making*, 7 FCC Rcd 6886 (1992) (*First Report & Order*).

[9] *Id.* at 6890

microwave bands by potentially allowing such licensees to relocate to the 1710-1850 MHz government band.[10]

The FCC established a similar transition plan to relocate incumbent Specialized Mobile Radio (SMR) licenses in the 800 MHz band.[11] In that proceeding, the FCC stated that "any relocation of an incumbent must be conducted in such a fashion that there is a 'seamless' transition from the incumbent's 'old' frequency to its 'relocated' frequency (that is, there is no significant disruption in the incumbent's operations)."[12]

It is unreasonable to expect licensees on Channel 87B to wait 13 years – longer than a single license term – to obtain access to a replacement channel.

III. Licensees of Channel 87B Unable to Relocate Seamlessly to Channels 84 or 85 Should Have Alternative Forms of Relief

In order to provide for a seamless migration from Channel 87B to replacement Channels 84 or 85 in areas where those channels are already occupied by incumbent licensees, PacifiCorp recommends that the Commission provide the licensee on Channel

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[10] *First Report & Order*, 7 FCC Rcd at 6892; Redevelopment of Spectrum to Encourage Innovation in the Use of New Telecommunications Technologies, *Second Report and Order*, 8 FCC Rcd 6495, 6520 (1993); Redevelopment of Spectrum to Encourage Innovation in the Use of New Telecommunications Technologies, *Third Report and Order and Memorandum Opinion and Order*, 8 FCC Rcd 6589, 6601-02 (1993); Redevelopment of Spectrum to Encourage Innovation in the Use of New Telecommunications Technologies, *Memorandum Opinion and Order*, 9 FCC 1943, 1952 (1994).

[11] Amendment of Part 90 of the Commission's Rules to Facilitate Future Development of SMR Systems in the 800 MHz Frequency Band, *First Report and Order, Eighth Report and Order, and Second Further Notice of Proposed Rule Making*, 11 FCC Rcd 1463 (1995).

87B with two options: (1) the right to use Channel 87B until a date that is six months after the date the incumbent licensee on Channels 84 or 85 cancels its license for such usage, or (2) the right to apply for an unlicensed exclusive-use channel in the VHF band (*e.g.*, such as a VHF channel allocated under Part 22 of the FCC's Rules) that can used by the Channel 87B licensee until a date that is six months after the incumbent licensee on Channels 84 or 85 cancels its license for such usage. Either of these options would provide existing licensees of Channel 87B with some ability to operate during the 15-year transition period for licensees on Channel 84 and 85 to discontinue such use.

IV. The Commission Should Address the Net Loss of Interstitial Channels to VPC Licensees

A. Reallocation of Channel 87 to AIS Also Causes Loss of Two "Interstitial" Channels for VPC

Although the FCC has proposed a one-for-one channel replacement for VPC licensees on Channel 87B, the reassignment of Channel 84 or 85 to replace Channel 87 will not make VPC licensees entirely whole. Pursuant to Section 80.371(c)(1)(iii) of the Commission's Rules, a VPC licensee "may operate on the 12.5 kHz offset frequencies in areas where the licensee is authorized on both frequencies adjacent to the offset frequency, and in areas where the licensee on the other side of the offset frequency consents to the licensee's use of the adjacent offset frequency." Thus, in areas where a VPC licensee of Channel 87 also holds the license rights to Channels 27 and 28, the VPC licensee may use the two 12.5 kHz interstitial channels between Channels 27 and 87 and

[12] *Id.* at 1510.

between 87 and 28. These interstitials are commonly referred to as Channels 227 and 287, respectively. Reallocation of Channel 87 to AIS results in loss of these two interstitial channels.

B. Reallocation of Channel 84 or 85 Only Allows VPC Access to One Additional "Interstitial" Channel

However, allocation of Channels 84 or 85 for Channel 87 only provides VPC licensees with potential access to one new interstitial channel because Channel 25, which is adjacent to both Channels 84 and 85, remains allocated for Public Safety use. That is, in areas where Channel 84 is reallocated from Public Safety to VPC use, the VPC licensee gains Channel 84 and the interstitial channel between Channel 24 and 84 (commonly referred to as Channel 224). However, the interstitial between Channel 84 and Channel 25 (commonly referred to as Channel 284) is unavailable to the VPC licensee because Channel 25 will remain allocated to Public Safety. Similarly, in areas where Channel 85 is reallocated from Public Safety to VPC, the VPC licensee gains Channel 85 and the interstitial between Channel 85 and Channel 26 (*i.e.*, Channel 285), but not the interstitial between Channel 25 and 85 (*i.e.*, Channel 225).

Although it permissible under Section 80.371(c)(1)(iii) for a VPC licensee to reach agreement with the licensee of the adjacent channel concerning use of the interstitial channel, this is not possible as a practical matter with channels that are allocated for Public Safety use. Public Safety operations are licensed on a site-by-site basis, pursuant to Part 90 frequency coordination. Therefore, no single licensee controls the Public Safety channels throughout the relevant VPCSA. As a result, the interstitial channels at either side of the Public Safety allocations are "stranded" and cannot be used.

The issue can be illustrated as follows, using the standard industry nomenclature for the 12.5 kHz channel plan for VPC spectrum. As shown on the chart below, in areas where Public Safety is allocated Channels 84 and 25, or Channels 85 and 25, Public Safety licensees have access to only three 12.5 kHz channels. Two 12.5 kHz channels are effectively "stranded" because they straddle the channel boundary between the Public Safety allocation and the VPC allocation.

	Current 12.5 kHz Channel Allocations in Inland VPCSAs (25 kHz Channel Centers Shown as Bold)							
Areas where Channels 84 and 25 are allocated to Public Safety	**424**	*224*	**484**	*284*	**425**	*225*	**485**	*285*
Areas where Channels 85 and 25 are allocated to Public Safety	**424**	*224*	**484**	*284*	**425**	*225*	**485**	*285*
		Channels Allocated to Public Safety						
		Interstitials *Potentially* Available to Public Safety						
		Interstitials Unavailable to Any Licensee						

C. Allocation of Channels 84 and 85 to Public Safety in Different VPCSAs Has Led to Inefficient Spectrum Use

The allocation to Public Safety of Channel 84 in some VPCSAs while Channel 85 is allocated to Public Safety in other VPCSAs has resulted in inefficient spectrum use for both Public Safety and VPC licensees. PacifiCorp notes, for example, that the State of Wyoming has fully licensed Channel 425 throughout most of the state because it has access to Channel 25 in the multiple VPCSAs in which it operates. However, the State has made significantly less use of Channels 484 and 284, apparently because of its need to protect VPC geographic area licensees in adjacent VPCSAs where Channel 84 is allocated for VPC use. Attached as Exhibits A through C are maps that generally depict the extent to which the State of Wyoming has been able to license these 12.5 kHz

channels.[13] As can be seen on these maps, the State can only use Channel 484 or 284 in areas that are significantly distant from VPCSA 31 where Channel 84 is allocated for VPC use.

As noted above, reallocation of Channel 87B to AIS, even with the allocation of replacement Channels 84 or 85, results in a net decrease of spectrum to Channel 87 VPC licensees because they will no longer have access to the two 12.5 kHz interstitial channels on either side of Channel 87 (*i.e.*, Channels "227" and "287") and will, at most, pick up one interstitial channel associated either Channels 84 and 85; that is, VPC licensees will acquire access to Channel 224 in areas where Channel 84 is reallocated to VPC, and VPC licensees will acquire access to Channel 285 in areas where Channel 85 is reallocated to VPC.

D. An Alternate Channel Plan for Inland VPCSAs Will Promote More Efficient Spectrum Use, Including for Public Safety

In order to partially address the net loss of spectrum to licensees of VPC Channel 87, and to make for more efficient use of the VPC spectrum allocated to Public Safety, PacifiCorp recommends that the Commission adopt a channel plan that will permit inland VPC licensees to use two 12.5 kHz channels that are 6.25 kHz offset from the normal center frequency of each 25 kHz VPC channel. As explained herein, if the Commission retains the current12.5 kHz channel bandplan for the inland VPCSAs, it still possible to

[13] The State of Wyoming was granted a waiver of Section 90.20(g)(2)(i) to permit the licensing of the 12.5 kHz "offset" (interstitial) channels between the standard VPC channels for which it was licensed. The State demonstrated that it would be spectrally efficient to use three 12.5 kHz channels in the same amount of spectrum that would only

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configure the band to make more efficient of this limited spectrum, but it would not be as efficient as allowing licensees to operate two 12.5 kHz channels in each standard 25 kHz VPC channel assignment.

If the FCC retains the standard VPC bandplan for use of 12.5 kHz channels, the FCC could adopt the following channel plan to minimize "stranding" of spectrum:

	Proposed Allocations to Optimize Use of 12.5 kHz Channels in Inland VPCSAs (25 kHz Channel Centers Shown as Bold)							
Areas where Channel 84 is allocated as replacement for Channel 87B	**424**	*224*	**484**	*284*	**425**	*225*	**485**	*285*
Areas where Channel 85 is allocated as replacement for Channel 87B	**424**	*224*	**484**	*284*	**425**	*225*	**485**	*285*
		Channels Allocated to Public Safety						

Under this suggested modification to the current VPC channel plan, Public Safety would have exclusive access to Channels 284 and 425 in all inland VPCSAs, in lieu of Channel 25. This would not result in a reduction in spectrum for Public Safety but would provide greater opportunities for Public Safety to use this spectrum for its required purpose; namely, interoperability. Moreover, by recognizing that most licensees in this band are or will be using 12.5 kHz equipment, there will be no "stranding" of spectrum at the edges of the Public Safety allocation. Public Safety licensees will have access to two 12.5 kHz channels instead of only one 12.5 kHz channel if they only retain Channel 25 (Channel 425). VPC licensees relocating from Channel 87 potentially will have access to

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support two 25 kHz band width channels. In the Matter of State of Wyoming, 23 FCC Rcd 10310 (PSHSB 2008).

one additional interstitial channel to make up for the loss of the two interstitial channels associated with Channel 87.

However, PacifiCorp believes that more efficient and effective use of the inland VPC spectrum could be made if the Commission adopts a revised 12.5 kHz channel plan for the inland VPCSAs. PacifiCorp recommends that the Commission permit inland VPCSA licensees to "split" the existing 25 kHz channel assignment and use two 12.5 kHz channels within the existing 25 kHz VPC channel assignment. Such channel-splitting will allow for more intensive use of VPC spectrum by avoiding the "stranding" of spectrum where a licensee chooses to deploy more spectrally-efficient 12.5 kHz equipment but does not control both of the adjacent 25 kHz channels. This bandplan would consist of a "high" and "low" 12.5 kHz channel within each standard 25 kHz VPC channel, illustrated as follows:

	24		84		25		85		26		86		27		87	28	
Areas where Channel 84 is allocated as replacement for Channel 87B	24L	24H	84L	84H	25L	25H	85L	85H	26L	26H	86L	86H	27L	27H	87 (AIS)	28L	28H
Areas where Channel 85 is allocated as replacement for Channel 87B	24L	24H	84L	84H	25L	25H	85L	85H	26L	26H	86L	86H	27L	27H	87 (AIS)	28L	28H
		Channels Allocated to Public Safety															

By eliminating the interstitial channels in the inland VPCSAs, there would be no stranding of partial channels as under the current interleaved channel plan.

V. Conclusion

Now that the FCC has reallocated Channel 87B for exclusive AIS use nationwide, PacifiCorp respectfully requests the Commission to provide for a seamless transition to suitable replacement channels by allowing inland VPCSA licensees to remain on channel

87B or use comparable exclusive-useVHF spectrum until incumbent licensees are relocated from replacement Channels 84 and 85. PacifiCorp also requests the Commission to amend the rules to provide relief for VPC licensees who would otherwise suffer a net loss of potential spectrum capacity through assignment Channels 84 or 85, and thereby promote more efficient use of this limited spectrum.

WHEREFORE, THE PREMISES CONSIDERED, PacifiCorp respectfully requests that the Commission take action in this proceeding consistent with the views expressed herein.

Respectfully submitted,

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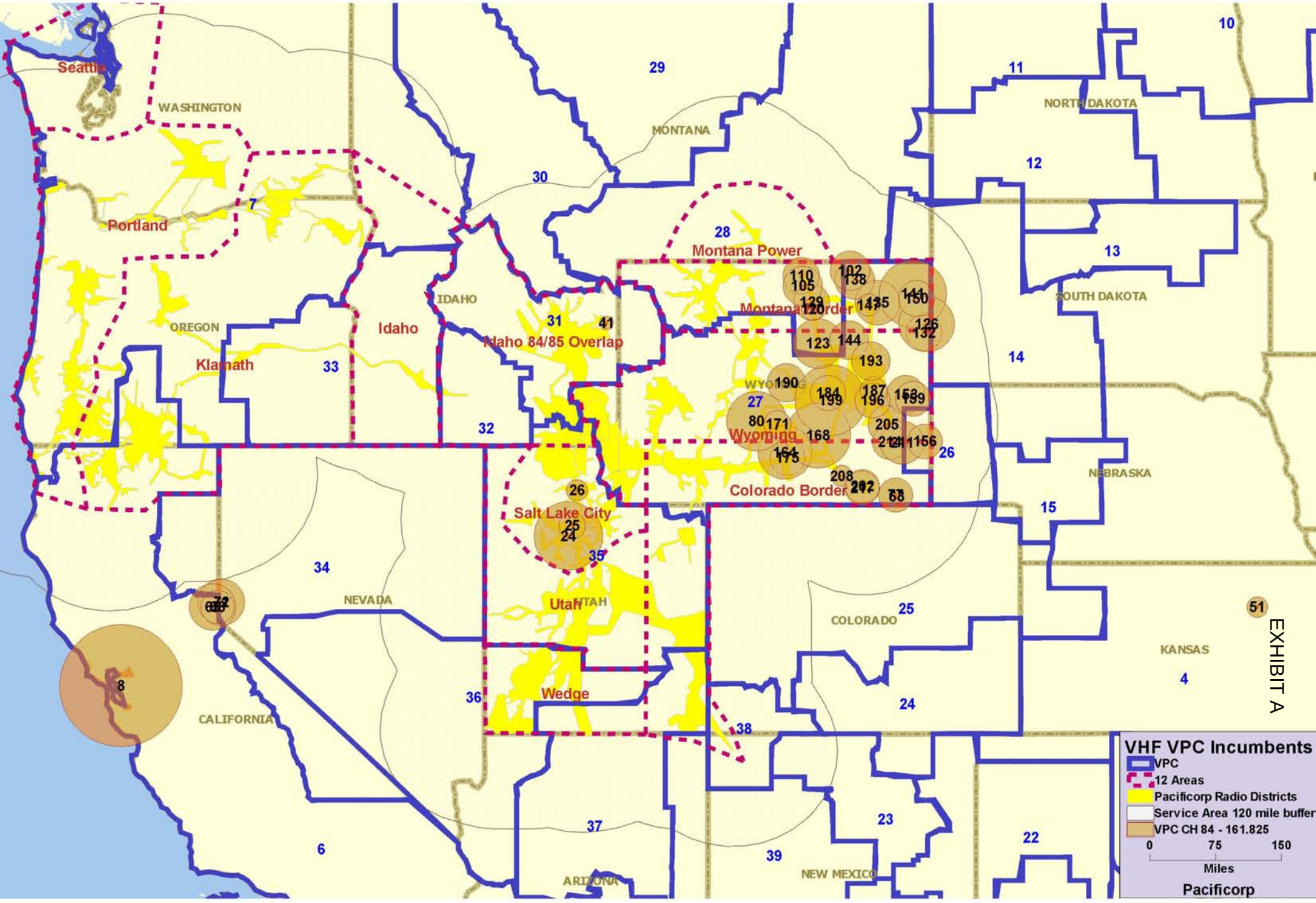
Dated: March 2, 2009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KANSAS
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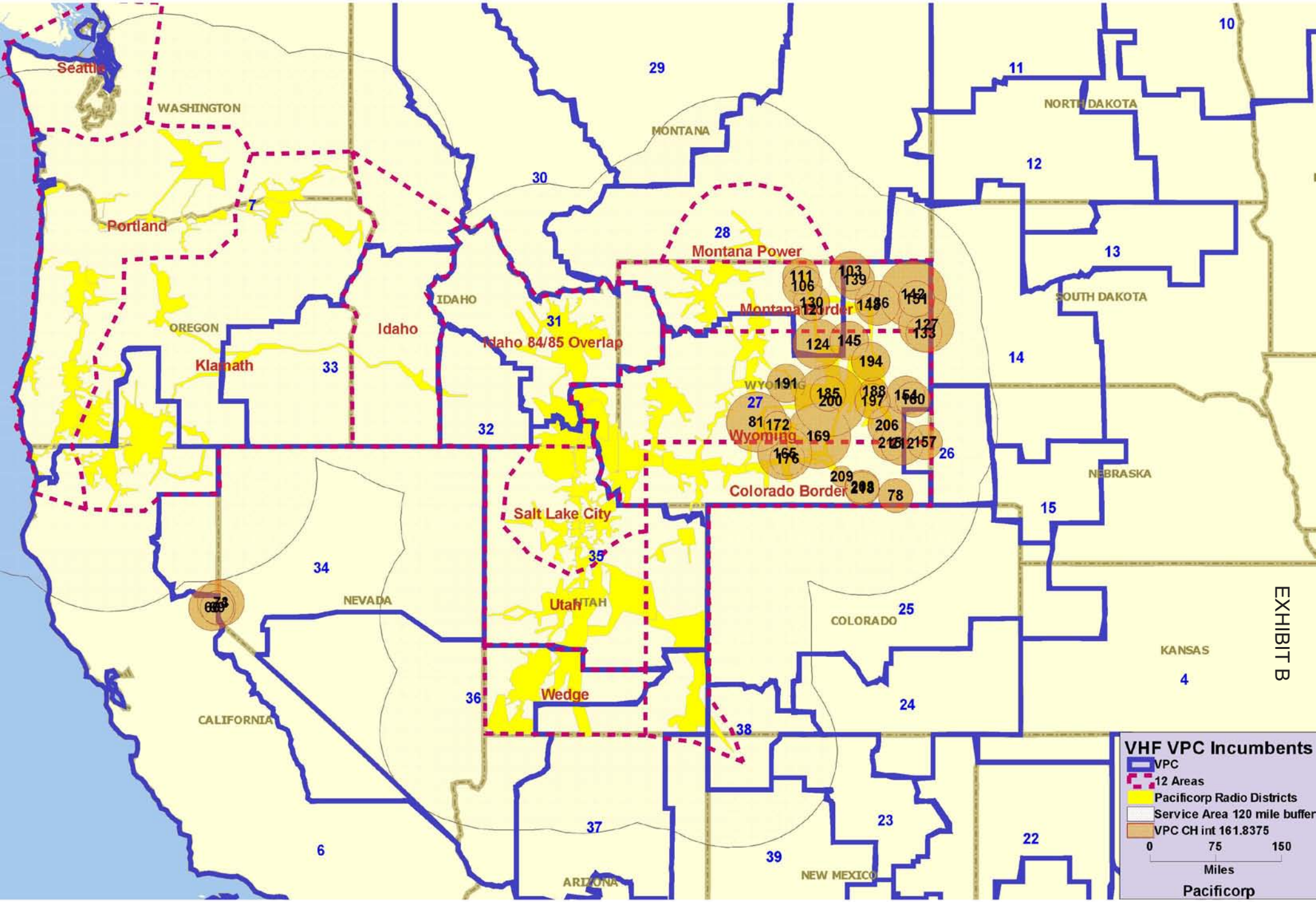
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EXHIBIT B

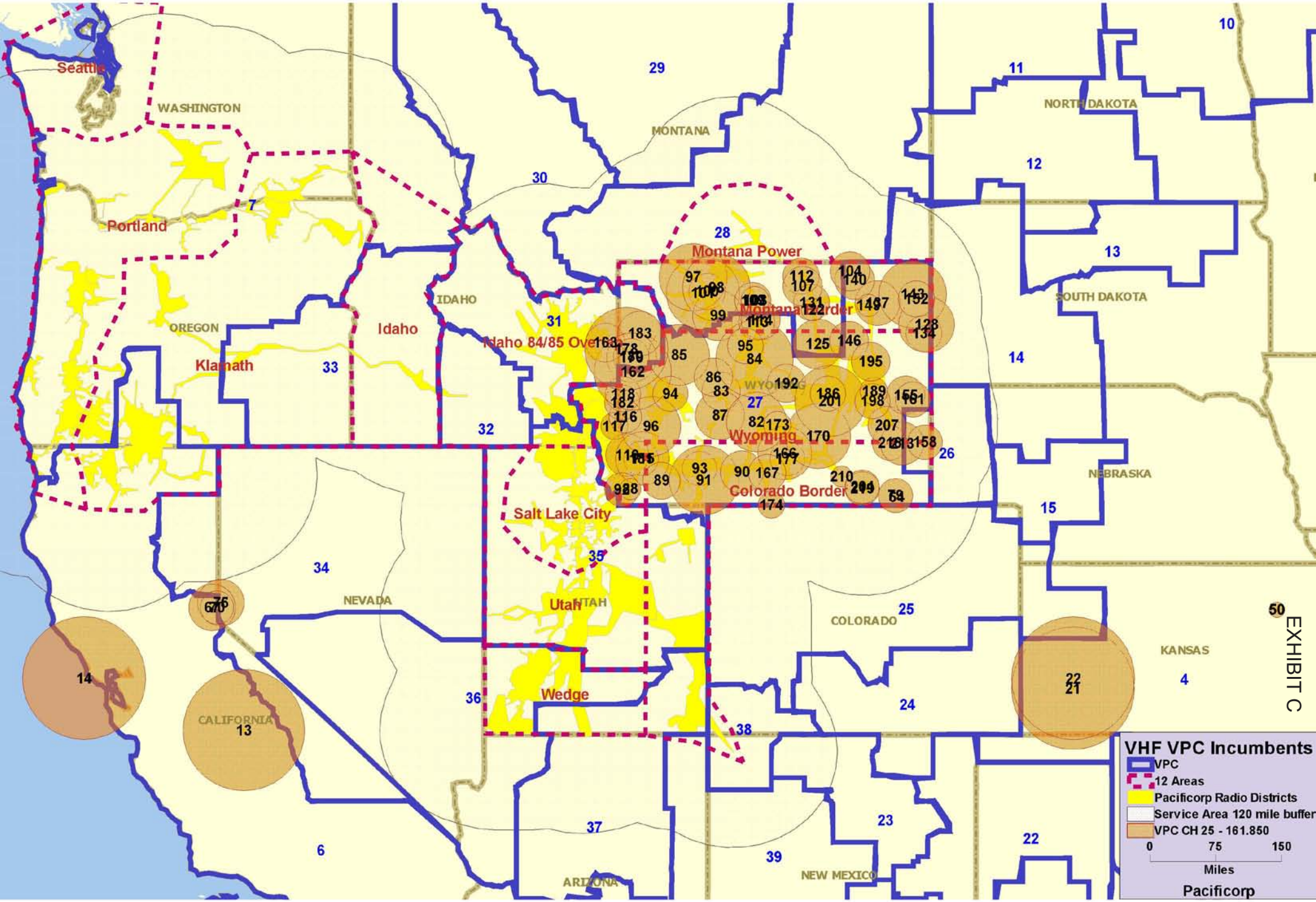
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EXHIBIT C