

EXHIBIT A LINE A AND LINE C

Definitions

Line A. An imaginary line within the U.S., approximately paralleling the U.S.-Canadian border, north of which Commission coordination with the Canadian authorities in the assignment of frequencies is generally required. It begins at Aberdeen, Washington, running by great circle arc to the intersection of 48° N., 120° W., then along parallel 48° N., to the intersection of 95° W., thence by great circle arc through the southernmost point of Duluth, Minnesota, thence by great circle arc to 45° N., 85° W., thence southward along meridian 85° W. to its intersection with parallel 41° N., to its intersection with meridian 82° W., thence by great circle arc through the southernmost point of Bangor, Maine, thence by great circle arc through the southernmost of Searsport, Maine, at which point it terminates.

Line C. An imaginary line in Alaska approximately paralleling the border with Canada, East of which Commission coordination with Canadian authorities in the assignment of frequencies is generally required. It begins at the intersection of 70° N., 144° W., thence by great circle arc to the intersection of 60° N., 143° W., thence by great circle arc so as to include all the Alaskan Panhandle.

Analysis

Line A issues – Operation on many public safety and land mobile frequencies is completely prohibited, or restricted in locations North of Line A. The exact coordinates for Line A are described in the FCC rules. Line A is intended to protect radio stations in southern Canada which are close to the border between the 48 contiguous U.S. States and Canada. Applications for licenses or special temporary authorizations for locations North of Line A on Line A frequencies require coordination with Canada. These applications often require long periods of time, and often cannot be granted in order to provide legally-required protection for stations in Canada. The problem is particularly acute in Western New York State, since Buffalo and Rochester are two large Metropolitan areas which are North of Line A. This situation also occurs on some of the nationwide VHF and UHF interoperability channels. The American Red Cross is also affected by Line A issues, in that many of the licenses for the Red Cross National frequency (47.42 MHz) which authorize “national” coverage (such as KGB223), Continental US coverage (such as KA3699), or “Statewide NY” coverage (such as WQJP828, KYN969, and KDD913) have special conditions which restrict operation to locations south of Line A. Except for the 420 – 430 MHz band, there are no requirements or restrictions in the U.S. Amateur Radio service rules (47 CFR 97) related to Line A.

Line C issues – Line C is located in eastern Alaska, and is intended to protect Canadian stations in Yukon province by restricting the operations of U.S. Stations which are East of Line C. The Line C issues are similar to the Line A issues noted above. There are no requirements or restrictions in the U.S. Amateur Radio service rules (47 CFR 97) related to Line C.