

# CONSOLIDATED SPECTRUM SERVICES

231 SAGAMORE ROAD  
GILFORD, N.H. 03249  
PHONE/FAX: (603) - 293 - 0002  
Email: [Sales@FCC1.biz](mailto:Sales@FCC1.biz)

In the Matter of	)	
	)	
Amendment of Part 90 of the Commission's Rules	)	WP Docket No. 07-100
	)	
Implementing a Nationwide, Broadband, Interoperable Public Safety Network in the 700 MHz Band	)	PS Docket No. 06-229
	)	
Service Rules for the 698-746, 747-762 and 777- 792 MHz Bands	)	WT Docket No. 06-150
	)	

In reference to the Discussion at paragraph 61, (aeronautical operation-90.1205(C) amendment), we respectfully make the following comments:

Calculations based on ITU RA769-2 Calculations, reference <http://www.gb.nrao.edu/IPG/ITURRA769.pdf> , are to be submitted to all radio observatories whose boundaries fall within a threshold of the aeronautical mobile edge.

The National Radio Astronomy Observatory in Greenbank, WV shall be notified as well. They maintain the Very Long Base Array (VBLA). Any impact to the VBLA shall be per ITU RA 769-2.

The appropriate Department of Defense Facilities shall be notified as well.

NASA Goldstone which conducts Deep Space Communications does not go by the ITU Specification. They are much more stringent. A basic restricted zone can be found on page 14 of the file [http://ipnpr.jpl.nasa.gov/progress\\_report/42-165/165A.pdf](http://ipnpr.jpl.nasa.gov/progress_report/42-165/165A.pdf)

Letters of Approval are to be secured from all of the above entities and submitted to the commission.

We support a height limit of 1500 feet above ground level and any restrictions placed on the air mobile operation by either NASA JPL, any Radio Astronomy Observatory or the Department of Defense.

Respectfully Submitted,

*Howard Epstein*

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