



UNITED STATES DEPARTMENT OF COMMERCE
National Telecommunications and
Information Administration
Washington, D.C. 20230

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Federal Communications Commission
Office of the Secretary

Mr. Julius P. Knapp
Chief, Office of Engineering and Technology
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

ET Doc. No. 12-338

Dear Mr. Knapp:

I have recently discovered that the coordinates for some radio astronomy sites and the Department of Commerce (DOC) Table Mountain site differ between the National Telecommunication and Information Administration (NTIA) Manual of Regulations and Procedures for Federal Radio Frequency Management (Manual) and the Federal Communication Commission (FCC) rules. More specifically, the coordinates for radio astronomy listed in US388 and in 47 C.F.R. Section 15.712 (h) are different. Additionally, Section 8.3.20 of the NTIA Manual lists the coordinates for the non-radio-astronomy site at Table Mountain as 40 07 50W, 105 14 40N, while Section 15.712 (h) of the FCC's rules lists 40 07 50W, 105 15 40N.¹ I would like to resolve these differences and align our rules.

The National Science Foundation (NSF) informed NTIA that they have been attempting to standardize the data by adopting the coordinates used in Annex E of the NSF Strategic Spectrum Plan (SSP).² The coordinates of the radio astronomy sites listed in US388 are in agreement with the coordinates listed in the NSF SSP; therefore, the coordinates in 47C.F.R. Section 15.712 (h) should be modified to reflect those in US388. In addition, NSF informed us that: i) the Five Colleges Radio Observatory is no longer in operation and should be deleted from US203 and US388; and ii) the Heinrich Hertz Submillimeter Observatory, Mt. Graham, AZ (32 42 06N, 109 53 28W) should be added to US388. NSF also requested the coordinates of the Arecibo Observatory, listed in 47 C.F.R. Section 15.712 (h), be revised to read 18 20 37N, 66 45 11W.

The correct coordinates for the Table Mountain site are 40 08 02N, 105 14 40W. We request that the FCC make the necessary modifications to its rules.

¹ See Manual of Regulations and Procedures for Federal Radio Frequency Management; May 2011 Revision of the January 2008 Edition.

² See the NSF "Strategic Spectrum Plan" (November 2007) at http://www.ntia.doc.gov/files/ntia/publications/nsf_strategic_spectrum_plan_nov2007.pdf.

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We look forward to working with you to make the necessary modifications to both the 47 C.F.R. and the NTIA Manual. Mr. Edward M. Davison (202-482-5526; edavison@ntia.doc.gov) is the NTIA point-of-contact on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'Karl B. Nebbia', written in a cursive style.

Karl B. Nebbia
Associate Administrator
Office of Spectrum Management