



# CITY OF LONG BEACH

DEPARTMENT OF TECHNOLOGY SERVICES

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FEDERAL COMM

December 28, 1998

Federal Communications Commission  
1911 M Street, N.W.  
Washington, D.C. 20554

98-172

Dear Gentlemen:

Attached is an original and nine copies of the Reply Comments from the City of Long Beach, California concerning IB Docket No. 98172. Enclosed is a self-addressed, stamped envelope so a "date stamped" copy can be returned to my attention.

Should you have any questions, please contact me at (562) 570-2787.

Sincerely,

Bryan Hawkins  
Wireless Communications Officer

Enclosures

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BEVERLY O'NEILL  
MAYOR  
CITY OF LONG BEACH

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**FCC MAIL ROOM** Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of )  
)  
Redesignation of the 17.7-19.7 GHz Frequency )  
Band, Blanket Licensing of Satellite Earth Stations )  
in the 17.7-20.2 GHz and 27.5-30.0 GHz Frequency )  
Bands, and the Allocation of Additional Spectrum in )  
the 17.3-17.8 GHz and 24.75-25.25 GHz Frequency )  
Bands for Broadcast Satellite-Service Use )

IB Docket No. 98-172  
RM-9005  
RM-9118

To: The Commission

**REPLY COMMENTS OF  
THE CITY OF LONG BEACH, CALIFORNIA**

The Commission has established a Pleading Cycle in the proceeding to redesignate portions of the 18 GHz frequency band, including proposed segmentation and sharing and reallocation of bands, currently used by a variety of fixed wireless services. The City of Long Beach is taking this opportunity to submit Reply Comments in support of Comments filed by the Association of Public Safety Communications Officials - International ("APCO"), the Fixed Wireless Communications Coalition ("FWCC"), and the County of Los Angeles ("County").

The City of Long Beach currently has six operational paths in the 18 GHz microwave band. These paths provide vital links to all remote radio hill-sites and other major facilities. Public Safety and supporting local government entities depend heavily on these paths always being available to protect life and property.

The changes the Commission has proposed for the fixed service allocations in the 18 GHz band are very significant. Long Beach strongly opposes the Commission's proposal for the following reasons:

## REPLY COMMENTS OF THE CITY OF LONG BEACH, CALIFORNIA

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- 1) A significant threat of interference to our present links exists from the proposed new satellite service in the 18 GHz band. Our systems carry vital Public Safety communications and cannot be compromised by the potential for harmful interference.
- 2) The Commission's proposal would substantially reduce further the available microwave spectrum for future fixed operations for Public Safety.

Currently, fixed services are co-primary in the frequency bands 17.7-19.7 GHz. The Commission's proposal lowers to secondary the status of fixed services in two bands, 18.3-18.55 GHz and 18.8-19.3 GHz. Though the proposal "grandfathers" existing licensees (i.e., City of Long Beach) in these bands, interference will be likely to the incumbents. Also, as the Commission itself suggests, the band may be susceptible to interference from grandfathered fixed microwave services. This situation suggests to us that the next step would be to ask the fixed service users to relocate.

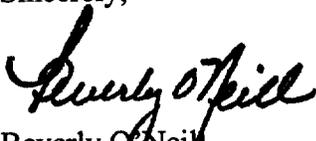
Overall, the relocation issue is a very sensitive point for the Public Safety community. In the recent past, the Direct Broadcast TV satellites took away the Public Safety spectrum at 12 GHz and, soon after that, the Personal Communications Service appeared and took away further Public Safety spectrum. Now, the Commission is wanting to further deplete the microwave spectrum resources available for Public Safety, without even a suggestion of alternate spectrum that could be made available for Public Safety. The idea is simply to "just relocate." Thus, while Public Safety is undergoing the trauma of relocating from its former 2 GHz (PCS) links, another threat of additional spectrum being eliminated presents itself.

Over the last 20 years, Congress has consistently supported Public Safety and mandated it be given top priority for spectrum needs. We ask the Commission to consider this mandate and status when these types of proposals are made. Public Safety agencies do not have any alternate bands that will satisfy their technical requirements.

Microwave is the only acceptable method for connecting many of Long Beach's key communications sites. Wirelines are very expensive, frequently unreliable, and can interrupt vital communications. This is particularly true in the Southern California area because of its susceptibility to earthquakes and other disasters.

In conclusion, the City of Long Beach strongly urges the Commission not to take any action that would expose existing Public Safety users to possible interference from new users and further reduce the availability of fixed microwave for Public Safety.

Sincerely,



Beverly O'Neil  
MAYOR