

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

In the Matter of

**Improving Public Safety Communications in)
the 800 MHz Band)**

**Consolidating the 900 MHz Industrial/Land)
Transportation and Business Pool Channels)**

WT Docket No. 02-55

**REPLY COMMENTS
OF
GENERAL MOTORS CORPORATION**

General Motors Corporation hereby submits the following reply comments in the above captioned matter.

General Motors (GM) is the largest automotive manufacturer in the United States with numerous production facilities throughout the nation. In support of these operations, GM

has over 150 licenses of which approximately 56 are in the 800MHz spectrum. Among the plants supported by these 800 MHz licenses are eight General Motors assembly plants employing over 32,500 people and producing more than 1.6 million vehicles or about 1 out of every 10 vehicles sold in the United States. These frequencies support a number of critical manufacturing functions, including tracking of inbound parts and outbound finished vehicles; implementation of in-plant safety and security systems; and the support of production and maintenance functions. A single facility/production complex will typically have several hundred radios and, in the case of certain 800 MHz licenses supporting GM's Lansing, Michigan operations, over 2000 radios. Congestion on the current licenses is a serious issue with some cases ranging from 130-210 radios per frequency.

General Motors is fully supportive of the need for a strong public safety communications system. At the same time, General Motors is concerned that any action by the Commission to resolve reported problems be targeted in a way that adequately resolves the problem while not functionally or economically disadvantaging parties operating within the scope of their licenses who are not creating any harmful interference. In this regard, General Motors is deeply concerned by and must oppose the proposal set forth by Nextel Communications and presented in the NPRM as it would create an extraordinary expense and serious disruption to GM's manufacturing operations in order to resolve a problem created by license holders, such as Nextel, who are simply seeking a method to ease confines on their business models by shifting the burden of solution to non-interfering license holders. .

By way of example, GM has an 800 MHz license in Lansing MI that supports manufacturing operations at GM's Lansing automotive operations. The plant radio systems have approximately 2300 radios operating on the license -- with the 10 frequencies averaging over 200 radios per channel. In the past, GM has attempted to acquire additional spectrum in the 900 MHz range, but there has been and currently is no available spectrum. The radio system is critical to the operation of the plants as illustrated by the following partial list of functions supported by the system: safety, security, scheduling, assembly operations, paint shop operations, body shop operations, material control, as well as in- and out-bound logistics.

Based on discussions with telecommunications suppliers, GM estimates that replacing the system just for these Lansing facilities - as would be required if the license were relocated - would cost approximately \$4-5 million. Importantly, however, there is no 900 MHz spectrum available in the Lansing area. Even in areas where like spectrum may be available, there is no evidence that comparable bandwidth would be available. The standard for voice in the 900 MHz band is 12.5 KHz, but many of the data applications used in GM's manufacturing operations require 25 KHz of bandwidth.

General Motors questions whether the parties creating the reported harmful inference with public safety have closely examined the options and opportunities to resolve the problem without putting a significant portion of the U.S. manufacturing sector at risk and

placing a significant financial burden for the proposed spectrum redeployment on license holders who are not the source of the reported interference.

As a long established manufacturer, it is likely that relocation involving any compromise to GM's already difficult 800 MHz operating situation would uniquely disadvantage it and other domestic automotive manufacturers who have held 800 MHz licenses for extended periods of time compared to newer entrants who likely located on 900 MHz as the 800MHz bands were fully licensed when they set up their operations. Further, in GM's view, any resolution must take into account the fact that a number of licenses such as many of those held by GM, fall within geographic areas where spectrum policy also comes under spectrum administration agreements with Canada.

Finally, GM does not view a resolution that would require it to pay for any relocation as equitable. Even assuming that 900MHz spectrum would be available with adequate bandwidth and that coordination with Canada could be resolved, the estimated cost is at least \$15-20 million for relocation to solve a problem not created by General Motors. And this estimate does not include the cost of the substantial disruption to production operations during the relocation transition.

GM believes that Nextel and various commenters have incorrectly assumed away the practical and very real economic damage associated with resolving the issue of improving public safety communications as proposed. GM urges the Commission to fully consider

all non-relocation solutions before considering any of the extraordinarily complex alternatives involving relocation.

Respectfully submitted,

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