

RE: Docket No. 02-135

Spectrum policy task force seeks public comment on issues related to commission's spectrum policies.

Carla Beaudet, RFI engineer

The marauders of our day are not bands of spear-toting brigands, but multi-national corporations usurping natural resources of all descriptions, including the radio spectrum. Governmental regulation is the public's only defense against such occupancy. It can be argued that communications services and the passive services are both in the public interest, and we would worry about this argument if the issue at stake were the existence of either one service or the other, but that is not the issue. The real issue is a tiny cut in profitability that communications companies would suffer if they installed filtering, or better modulation schemes designed to keep emissions out of the passive service bands.

In an attempt to quantify the losses incurred by the radio astronomy service due to interference, I refer you to ITU document 7D/86-E, which relates these losses to channel capacity, a term understood in the telecommunications industry. No telecommunications company would tolerate the loss of channel capacity incurred by the RAS due to the out of band and spurious emissions of their neighbors even as allowed under the current regulations. Relaxing these regulations to form a more "market-oriented allocation and assignment policy" would spell the beginning of the end for radio astronomy and other passive services.

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