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# COUNTY OF CAMPBELL



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November 13, 2003

Marlene Dortch, Secretary  
Federal Communications Commission  
445 Twelfth St. SW, Room TW A-325  
Washington DC 20554

Re: Ex Parte Notice – WT Docket 02-55  
Improving Public Safety Communications in the 800 MHz Band

Dear Secretary Dortch:

I am writing on behalf of American Electric Power, Southside Electric Cooperative, Virginia Power and other utilities serving Campbell County in response to the Consensus Party's plan to freeze all requests of non-public safety users, such as public utilities, to expand utilization of bandwidth in the 800 MHz arena. It is my understanding that the Consensus Party's request would restrict utility companies to expand their radio systems to fill coverage gaps in order to provide more bandwidth, at least in part, for development of commercially marketed "push-to-talk" service.

The FCC will have an important decision to make in these proceedings and I would appreciate the following thoughts being taken into consideration. In rural areas where gaps in service currently exist for utility companies, a freeze would impair the ability of those utilities to communicate effectively not only during day-to-day operations, but also during emergency situations, such as storm related outages recently experienced with Hurricane Isabel. Electric utilities are often first responders to emergency situations in our community. As such, public safety agencies work hand-in-hand with these utility workers and coordinate to secure and clear unsafe conditions due to downed power lines and restore service to homes and businesses that rely on utility services for basic needs. Public safety agencies frequently share tower sites with electric utilities and have developed a healthy partnership that could be jeopardized under the proposed plan by the Consensus Parties.



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I am not in a position to evaluate the broader issues of what services should be assigned to what bandwidth. That is clearly a responsibility of the FCC and is recognized to be a daunting task. What I would ask is that the FCC give every consideration to American Electric Power and other utilities like them who serve areas where coverage is a problem and not hamper them in their efforts to enhance mobile radio coverage. That coverage is critical not only to the safety of the utility workers, but also provides an invaluable cooperative service to many cities, counties and towns throughout our country. In the event that the FCC believes that the most appropriate course of action is to limit further expansion in the 800 MHz bandwidth by utilities then I would encourage you to recognize that the bandwidth being made available to the Consensus Parties has tremendous commercial value, which will be exploited at the expense of the current users of that bandwidth. If the FCC believes that the best interests of our Country will be met by providing bandwidth access for these commercial purposes then a requirement of the allocation of bandwidth using this process should be monetary compensation from the Consensus Parties to those users of the current bandwidth that will be restricted in their future upgrade plans. That should include, but not be limited to, a compensatory allocation that would allow current users to move to emerging bandwidths in total, at no cost to the current users.

Thank you very much for your willingness to consider this input. If I can be of any assistance or provide you with any addition information, please do not hesitate to let me know.

With kind regards, I am

Respectfully,



R. David Laurrell  
County Administrator

C: Campbell County Board of Supervisors  
Ron Jefferson, American Electric Power  
M. Larry Longshore, Southside Electric Cooperative  
Bryant Brooks, Dominion Virginia Power  
Aubrey Cheatham, Director of Public Safety  
Mike Davidson, Director of Economic Development