



King County
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February 23, 2004

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Re: IB Docket No. 02-10 and FCC 03-286

Dear Ms. Dortch,

King County, Washington, respectfully submits the following comments in regards to the above referenced matter relating to the operation of satellite earth stations on board vessels (ESVs).

King County is the most populous county in Washington state and the major economic engine for much of the Pacific Northwest region of our country. As the 13th most populous county in the country, and one of the top twenty-five high risk target areas identified by the Department of Homeland Security, we also face a number of significant challenges in meeting our communications needs. These challenges are further magnified by our close proximity to the Canadian border which further restricts the spectrum available to us to meet our critical public safety and public service communications needs.

King County is located on Puget Sound, probably the second-most economically important inland waterway on the west coast after the San Francisco Bay area. In aggregate, the Puget Sound basin makes up approximately 50% of the State population and is home to major international companies and every branch of the US Military.

Public safety and public service agencies in King County rely on a mix of voice and data radio systems that are all linked together by highly reliable fixed station microwave radio systems. These systems allow us to attain high availability and reliability for our systems and provide critical links to remote radio transmitter and work sites where cost of construction of terrestrial links is prohibitive. Virtually all of these links are in the 6 GHz band and we therefore have significant concerns about this NPRM.

We have reviewed the filings being prepared by the Fixed Wireless Communications Coalition and agree with the observations and recommendations contained therein. We specifically support the recommendation that no ESVs be allowed to operate in the C-band within costal waters and inland waterways. It is our belief that the interference risks are just too high in allowing these mobile operations in the band. Even with tight controls, coordination, real-time tracking, or other techniques, interference would still have the potential to occur, and if that interference were to impair the operation of one of our critical public safety and public service microwave links (and therefore the voice and data systems that rely on them) the retrospective investigation and punishment of that interference would be insufficient to counter the harm encountered during the interference.

Detecting, isolating, identifying, and correcting interference in the microwave bands is much more difficult than in the lower mobile radio bands. It requires special equipment and can take a significant amount of time. Many state and local government entities do not have the equipment or the technical personnel to resolve what could be very difficult to determine cases of interference that seriously compromise critical public safety communications over a wide area. In the past, we have been subjected to interference caused by military shipboard radar units operating in the C-band. These were difficult to find and resolve. Resolving earth station interference could be more difficult as their emissions would not be as distinctive as the military radar.

We would encourage the Commission to not allow ESV operation in the C-band within any inland waterways in Washington State.

Sincerely,

A handwritten signature in black ink, appearing to read "Kevin Kearns".

Kevin Kearns
Director