

Before the
Federal Communications Commission
Washington DC 20554

In the Matter of)	
)	
Procedures to Govern the Use of)	IB Docket No. 02-10
Satellite Earth Stations on Board Vessels)	
in the 5925-6425 MHz/3700-4200 MHz)	
Bands and 14.0-14.5 GHz/11.7-12.2)	
GHz Bands)	

**REPLY COMMENTS
OF THE
COUNTY OF LOS ANGELES**

The County of Los Angeles, California (“the County”) hereby submits the following reply comments regarding the Commission’s *Notice of Proposed Rulemaking* in the above-captioned proceeding, FCC 03-286 (released November 24, 2003) (“*NPRM*”). The Commission is proposing new rules to govern the operation of Earth Stations on Board Vessels (“ESVs”) within certain frequency bands, including portions of the 6 GHz band allocated for Private Operational Fixed Service (“POFS”) microwave facilities. The County is greatly concerned with this issue as it is the licensee and operator of extensive POFS facilities that provide critical infrastructure for the County’s public safety radio communications.

Los Angeles County has a population of nearly ten million persons, and covers an area of 4,084 square miles of extremely varied terrain. The County includes the densely populated Los Angeles Basin bordering the Pacific Ocean, as well as high mountain ridges, isolated valleys, Catalina Island, and remote areas that are difficult to cover with

emergency radio communications. The County relies upon an extensive, highly reliable public safety radio communications network for its law enforcement, fire, EMS, and other essential services, both for day-to-day emergencies and to provide “first response” to major events such as earthquakes, wildfires, civil disturbances, and threats to homeland security.

Microwave links are a critical element of the County’s public safety radio system, providing the “backbone” that ties together its extensive network of radio transmitter sites across the County, as well as critical locations such as emergency operations centers, Sheriff’s stations, Fire Department locations, hospitals, jails, courthouses, public works facilities, and telecommunications centers. The County’s microwave network includes 51 links in the 6 GHz band.¹ Any interference to these microwave links could disrupt vital emergency communications.

Thus, the County is very concerned about the potential for interference from ESVs operating in or near the Port of Los Angeles and the Port of Long Beach, both of which are located within the County. These are the two busiest ports in the United States and, when combined, the third-busiest port complex in the world. The Port of Los Angeles is also the largest cruise traffic port on the West Coast. Therefore, if left unconstrained, there would be an extraordinary amount of ESV frequency use within the County, creating dangerous interference to public safety communications.

¹ Many of these are new links that replaced microwave paths that had used 2 GHz frequencies reallocated by the FCC for personal communications services (PCS).

CONCLUSION

Therefore, the County supports the comments of the Fixed Wireless Communications Council, the Association of Public-Safety Communications Officials, King County, WA, and others who agree that ESVs cannot be permitted to operate in any fashion or in any location that pose a potential for interference to fixed microwave communications.

Respectfully submitted,

COUNTY OF LOS ANGELES

By: /s/

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