

670

**Concurring Statement of  
Commissioner James H. Quello**

**RE: Interactive Video and Data Services, GEN Docket No. 91-2.**

Interactive video and data services have many potential applications serving consumers, and I am particularly interested in its application for educational purposes. Today's action allocates 1 MHz of spectrum to a wireless form of interactive video. The record does not demonstrate that 1 MHz is needed at this time; therefore, I would have preferred allocating 500 kHz until demand for interactive services has been determined. We are approaching this allocation, or more appropriately stated reallocation, with a Field of Dreams concept that if you build it they will come. Spectrum is far too valuable and in demand to reallocate on such a basis.

The other side of the equation in this reallocation Order is the taking away from the maritime services spectrum allocated for communication along America's waterways. I understand that some of this spectrum is essentially unusable by the maritime industry since it is adjacent to television channel 13 and would likely cause interference to broadcast service. Therefore, other non-interfering services, such as interactive video and data services, should have access to this valuable resource. The primary concern for me then is how much spectrum should be reallocated; and 500 kHz according to the proponents of interactive video and data systems seems to be a reasonable starting point. In the event that the demand for these services exceeds a 500 kHz allocation, then consideration of additional spectrum could be made. Alternatively, if the demand for these services fails to materialize, then the Commission will reclaim unused spectrum. With my primary concern being addressed, I concur with this item.