

October 26, 1984

CONCURRING STATEMENT OF
COMMISSIONER JAMES H. QUELLO

In re: Report and Order in Docket 83-45, which amends Parts 2, 22, 74 and 90 to reallocate television channels 15 and 16 in the Gulf of Mexico to the Offshore Radio Service (ORS) and allows the authorization of interstitial frequencies for ORS use in the existing ORS allocation at television channel 17.

While it isn't clear that the use of UHF television channels 15 and 16 is required to provide service to the Gulf of Mexico, it seems likely that it is, at least marginally, the least expensive means of doing so. The Commission is properly aware of the immediate monetary costs of providing service but it should also be focusing upon the longer-term costs in terms of spectrum usage. While we have given lip service to more efficient spectrum usage for many years, we continue to try to solve virtually all spectrum shortage problems by taking spectrum from UHF television.

If new spectrum-efficient technologies are to develop in a timely fashion, the Commission must establish incentives for such development. Dipping into more and more UHF spectrum allocated to television will not solve our problems forever.

In this instance, UHF television spectrum provides a solution that does not appear to cause harm to present or future television service in the Gulf area. My concern is that the solution to this unique situation will generate enthusiasm for similar solutions to future problems which will be harmful to existing or potential UHF television service. I want to make it clear that I will resist any such efforts.

Therefore, I concur.

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