

January 27, 1983

JCONCURRING STATEMENT
OF
COMMISSIONER JAMES H. QUELLO

In re: Proposed Amendment of Parts 2, 22 and 74 of the Commission's Rules
to Reallocate UHF-TV Channels 15 and 16 to Provide Additional Channels
to the Offshore Radio Telecommunications Service (ORTS) in the
Gulf of Mexico

I am willing to concede that there appears to be a developing need for more spectrum to permit communications with a growing number of offshore oil platforms in the Gulf of Mexico. I am not yet willing to concede that this spectrum should come from the UHF television spectrum.

First, I believe that the nature of the Offshore Radio Telecommunications Service should be more carefully defined. If, as it appears and the Association of Maximum Service Telecasters (AMST) suggests, ORTS is really a fixed service then perhaps its requirements could best be met through fixed service technology including satellite communications. If, on the other hand, ORTS is a mobile service, as it has contended, then the use of 900 MHz spectrum would seem to be appropriate. In any event, the use of these alternatives should be seriously considered and not summarily dismissed as this Notice of Proposed Rulemaking attempts to do.

While the argument is made that satellite communications to oil drilling platforms just to provide telephone service is inefficient, it's not clear to me that the communications needs of the offshore platforms is limited to voice service. I seem to recall representations to the Commission in the past that broadband data services were needed.

I would welcome comments on all of these issues to clarify both the needs and the alternatives. I believe the Commission needs a substantial record before it makes further incursions into the UHF television spectrum. I expect this Notice to provide much information that is clearly lacking at this time.

Therefore, I concur.