

March 1, 1985

CONCURRING STATEMENT
of
COMMISSIONER JAMES H. QUELLO

In re: Report and Order to authorize narrowband technologies for base and mobile communications in the Private Land Mobile Radio Services in the 150 MHz band.

The past two presidential elections popularized the phrase "There you go again." Today, that phrase can be applied to Commission rules governing Private Land Mobile Radio Services in the 150 MHz band.

The Report and Order adopted today is a positive step to the extent that it presents a new channel plan to accommodate narrowband technologies. However, the Report and Order requires geographic spacing to compensate for the reduced level of adjacent channel interference protection, and thus many of the narrowband systems will have to be placed outside urban centers. This will greatly diminish the potential for these systems to alleviate urban land mobile congestion. Accordingly, I question the significance of today's action in terms of providing an impetus for introducing narrowband technologies because such technologies will be essentially relegated to non-urban, non-congested areas where the need for efficient spectrum use is the least.

In my view, it is time for the Commission to make a bold move to announce a date on which base and mobile communications in the Private Land Mobile Radio Services in the 150 MHz band will be required to switch from the current inefficient FM technology to more spectrum efficient narrowband technologies. Clearly, a lengthy period is necessary, and the Commission should seek reasonable suggestions as to a specific date. Nevertheless, to allow for an orderly transition to the essential spectrum efficient technology permitted, it is necessary now to establish a date after which FM transmissions would be permitted only on a secondary basis.

While the prospect of a transition to any new technology is not without costs, in ten years we may expect that the demand for spectrum in the Private Land Mobile Radio Services will have reached crisis proportions and the costs of delaying change are far greater than providing for an orderly change. Failure to act now to remedy this clear problem is shirking our public interest responsibility.

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The only alternative to maximizing the use of existing Private Land Mobile Radio frequencies is to permit encroachment upon the UHF or other spectrum, an approach that will impose serious interference problems with existing service as well as limit new video options to the public. A far better approach would be to recognize that the time is now for spectrum efficient technologies to be implemented in the Private Land Mobile Radio Services and to require switching from FM technologies to narrowband technologies under a reasonable time schedule. The Report and Order adopted by the Commission today lends some encouragement to spectrum efficiency and the use of narrowband technologies; however, here we go again missing the opportunity to implement efficient spectrum planning.