

July 25, 1985 Adopted  
September 6, 1985

**Statement of Commissioner James H. Quello  
Dissenting in Part**

**Re: Amendment of the Commission's Rules to Allocate Spectrum for, and to Establish Other Rules and Policies Pertaining to, a Radiodetermination Satellite Service (RDSS) (General Docket NO. 84-689).**

I strongly support the establishment of a radiodetermination satellite service. A review of the comments reveals the potential array of public interest benefits offered by this service, such as safety to human life, reduced transportation and labor costs, and improvements in navigational services. Further, RDSS provides to the end user certain capabilities that currently are not available by any other means. For these reasons, I agree with the necessity to establish RDSS.

The Report and Order, however, also grandfathers all existing mobile licensees in the 2483.5-2500 MHz band on a co-primary basis with RDSS licensees and provides that RDSS licensees have the option of paying the "reasonable and prudent cost of modifying an existing licensee's operation" if interference from these mobile operations is unacceptable. I dissent to these provisions.

I object first to the concept of co-primary status. The Report and Order clearly establishes the public interest served by RDSS. If the needs met by RDSS are this great, then RDSS should be granted primary status and all other licensees should be given secondary status. Further, we are establishing a dangerous precedent by having the new user of the spectrum pay to relocate existing licensees. As the demand for spectrum increases and new services are developed warranting the reallocation of spectrum, the Commission may find itself increasingly burdened with resolving disputes associated with allocating the costs of relocation. Further, in some cases the delivery of new services that would fulfill public needs may be thwarted due to the costs associated with relocating existing licensees. Accordingly, I am dissenting in part to this Report and Order.