

United States Government
Memorandum

Date: March 25, 1987
To: Commissioner Dennis R. Patrick
From: Commissioner James H. Quello
Subject: Spectrum allocation process for the private land mobile radio services.

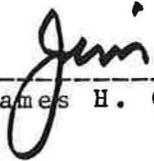
The UHF/Land Mobile proceeding and the recent revelation of the monitoring efforts by the Field Operations Bureau focuses needed attention on the Commission's allocation decision-making process. Over the years, I have been a critic of our allocation decisions because I felt the alleged need for spectrum lacked sufficient justification. In light of the apparent availability of spectrum already allocated to the land mobile services, it is now time for the Commission to develop a more rigorous procedure to assess need for spectrum. I am recommending the following:

1. The UHF/Land Mobile item be deferred indefinitely, while the Commission proceeds to develop need standards for additional frequencies. Such standards would assure efficient utilization of spectrum.
2. The FOB monitoring data and other material not previously available for public comment should be placed in the docket for comment.
3. The MST/NAB petition for a Notice of Inquiry pertaining to high definition TV should be issued for public comment. The Commission should then issue a NOI on high definition television with a substantial comment period (6 months).
4. Concurrently with the NOI on high definition television, the Commission should issue a NOI/NPRM on needs standards for additional frequencies. This NOI/NPRM should address among other matters the use and role of monitoring efforts in those urban areas where the alleged spectrum need is greatest.
5. The Commission should do a complete monitoring study of spectrum use in the top ten urban areas. This study should provide an accurate data base not only of channel occupancy, but also of channel use.*/ We should also assess to what extent the land mobile community is using spectrum efficient technology.

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6. Once the Commission has established need standards and the data base is clean, we can proceed with allocation decisions.

I present these talking points to assist you and the Commission in developing a course of action that would restore credibility to the spectrum allocation decision-making process. I hope to work closely with you on these matters.



James H. Quello

*/ This study should include a thorough review of the frequency coordination process.