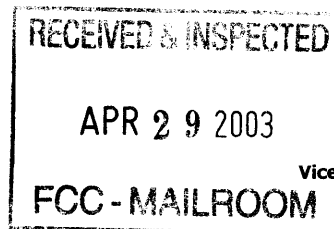


UTC

UNITED TELECOM COUNCIL

*The Telecommunications and Information
Technology Association for Utilities, Pipelines,
and Other Critical Infrastructure Companies*



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April 21, 2003

Experimental Licensing Branch
Office of Engineering and Technology
Federal Communications Commission
445 Twelfth Street, S.W., 7th Floor
Washington, DC 20554

Re: Call Sign WB9XSY, File No. 0135-EX-ST 2003

To the Branch:

This letter concerns the above-referenced call sign, a grant of Special Temporary Authority (STA) to Telex Communications for the purpose of providing audio headsets for use by utility employees in nuclear power generating plants across the country. UTC prefaces its remarks by noting that it supports the grant of the STA and does not suggest that the grant be withdrawn. Further, UTC expects to support fully an anticipated permanent request by Telex for waiver of Part 74 Rules to permit use of these headsets within nuclear power plants. Use of headsets such as those offered by Telex can provide important safety benefits for these workers, who are engaged in potentially dangerous activities necessitating hands-free communication systems.

However, having not seen Telex's STA request until after it was granted, UTC believes it has a responsibility to enhance the record of the STA grant with the addition of important facts. Most importantly, while nuclear power plant employees most definitely are subject to increased Homeland Security responsibilities, the use of Telex headsets is not expected to enhance security at these plants. The STA request was couched to permit prospective use of these headsets; in fact, the headsets have been in use at nuclear power plants for some time, generally without the knowledge of telecommunications network managers for the parent utilities. Once the usage was discovered, the need for an STA – and a permanent rule waiver – was self-evident. UTC appreciates the manufacturer's attending to this need, and the Commission's prompt grant of the STA.

Telex also stresses that use of the headsets is to be confined inside heavily protected containment buildings. This is mostly accurate, and there should be no concern for interference to any broadcast operations on the occasions when they are otherwise used. Doors to containment buildings must be opened during refueling operations – the most common use of hands-free headsets -- to permit the transfer of spent fuel rods, and headsets also are used occasionally in other buildings for training purposes. These headsets generally do not provide

encrypted communications. However, nuclear power plants generally are located far from centers of population, and buildings are located on large tracts of land. The miniscule emissions possible from low-power headsets in these situations are highly unlikely to cause interference, and there have been no reported cases of any interference during the time they have been in use.

As stated above, UTC supports the six-month STA grant, and believes a permanent waiver of Part 74 eligibility to permit nuclear plant employee use of these headsets would be an important safety benefit without any inconvenience or harm to other users of the spectrum. UTC thanks the Commission for this opportunity to enhance the record in this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "William M. Sykes". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Cc: Christopher Imlay, Esq.