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DATE: 10/20/1999

Federal Communications Commission
The Chief, Experimental Licensing Branch
New Technology Development Division
Office of Engineering and Technology
445 12th. Street, SW
Washington, D.C. 20554
Attn: Mr. James Burtle

Dear Mr. Burtle,

I recently received a copy of "APPLICATION FOR AIRBORNE MICROWAVE DOWNLINK VIDEO EXPERIMENTAL LICENSE" , Exhibit A , Applicant: County of Los Angeles

As a Amateur Radio Operator, and active on ATV , I am opposed to any grants of Amateur Radio Spectrum to Public Service Agencies or Commercial Interests. This Application, if granted would remove the only UHF band Amateur Radio has as a primary allocation. In addition to the above objection this application is flawed both technically, and politically.

The occupied bandwidth is miss-stated and four channels can not be accommodated within the requested spectrum. 10 watts is excessive power in in view of the fact that directive antennas will be used on both ends. Little activity was seen on the 2402 to 2448 MHz. spectrum by the poorly done survey of existing band activity. Exhibit A ignores the fact that Six Receive links are located on Santiago Peak at a elevation of 5600 Feet on 2418 MHz. In addition their is a omnidirectional receive input on 2442 MHz. on Santiago Peak, on Heaps Peak, and on Little San Gorgonio. All of these Sites have visibility into Los Angeles County. Nothing was mentioned about the Amateur Radio Satellite sub-band and potential interference to present and planed future Satellite operations. F.M. T.V. links were pioneered in the mid fifties using vacuum tube technology. Modern digital video technology, if employed in the current commercial bands, would make room for this request without impacting amateur frequencies.

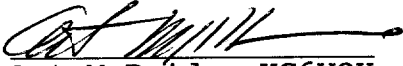
The Los Angeles County Sheriffs Department and FEMA sponsor RACES, a trained group of Amateur Radio Operators dedicated to provide Emergency Communications to the County of Los Angles in a time of a disaster. How can Los Angeles County expect to continue this program after angering the Amateur Radio Community by consuming almost all of one of our bands? I can see a need for short range air to ground T.V. support, but It is not clear to me why coverage needs to be expanded to administrative facilities via microwave links. Local links could be accomplished using commercial Part 15 devices and a high gain directive receive antenna.

The cost to purchase the equipment outlined in this proposal insures that once operational it would be almost impossible to stop the continuation of this project on the 13 cm. amateur band. Other counties would also apply for this use of the 13cm. band, and equipment manufactures would apply pressure the Commission to make this band a public service band. This band is not suitable for

public service as the 2418 to 2500 MHz portion provides for ISM and Spread Spectrum Part 15 devices. Public Safety depends on having allocations that are regulated and provide dependable interference free communications.

I urge you for the above reasons to find other spectrum for this application.

Thank-you


Art McBride, KC6UQH