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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the matter of)

COUNTY OF LOS ANGELES)

Application for Airborne Microwave
Downlink Video Experimental License)

File No. 0217-EX-PL-1999

To: The Chief, Experimental Licensing Branch
New Technology Development Division
Office of Engineering and Technology

COMMENTS TO OPPOSITION TO THE ARRL's INFORMAL OBJECTION

The Amateur Television Network (the ATN), an Association of Amateur Radio Operators utilizing television communications in the South Western part of the United States, ATN previously filed an informal objection to the County's application for an Experimental Analog FM Video Downlink License (FCC form 442). The County filed on March of 2000 an opposition to the ARRL's Informal Objection to the County's Application for an Experimental Video Downlink license. The County's Opposition Includes additional material allegedly justifying the experimental license application. In the interest of avoiding interference to ATN's Video Repeaters, links and to other Amateur Stations that use the 2.4 GHz Amateur Band, ATN states as follows.

1. In the County's Objection on page 1: "The Sheriff's Department and other County public safety agencies have long used helicopters and other aircraft for Surveillance and command and control operations. What the County does not have, and desperately needs, is the ability to transmit live video from those aircraft to command

centers on the ground". *That Claim is not correct and is misleading.* The County stated earlier in their license application, Exhibit "A", page three: " Los Angeles County is licensed to operate on 2460.9375 MHz (WPKK-851) for microwave video operations". Also on paragraph 6 of the County's opposition the County stated: "The monitoring study (submitted in their experimental license application) conducted by the County was never intended to demonstrate that the spectrum in question was "underutilized". *Again the County's claim is not correct and misleading.* In the County's application in Exhibit "A" under "Findings" the County stated just the opposite "The County has conducted extensive monitoring and data collection of this spectrum to confirm the under-utilization of the spectrum". Thus it is difficult to determine what is the truth with the County's statements in their justification for grant of the experimental license.

2. The intent of an experimental license is to allow researchers and others access to the spectrum on a temporary basis to develop new technology because no other spectrum was currently licensed for that purpose. In the County's application on form 442 the County is asking for 10M00F9F emission (Analog FM Video). This technology has been in existence and has been in use daily in most cities by aircraft including helicopters for decades. The ultimate need of the applicant (County of Los Angeles) for additional spectrum is not relevant to whether an experimental authorization should be granted. The issue is whether or not the applicant disclosed in his application that an experimental purpose is disclosed per Section 5.57(a) of the Commission's Rules, and the experimental operation can occur without interference to incumbents, licensed users, per Section 5.67(b) of the Commission's Rules. ATN, other Amateur groups, and individual

Amateur Radio Operators have repeater, base, mobile and portable stations in the 2.4 GHz band and are we are very concerned about receiving harmful interference to our stations from proposed airborne video transmissions by the County.

3. In Paragraph 1 of the County's opposition, the County claims they filed for the Experimental Video Downlink License to test the feasibility of using the 2402-2448 MHz band without causing or receiving destructive interference to and from the other users of the band. The County stated "Our studies show that this can be done, and we want to prove it by actual operations from a helicopter". ATN disputes this conclusion. ATN's engineer Mike Collis was contacted by the County and asked why ATN needed a video link at our Oat Mt. site and why we needed to run Amateur Television and occupy the 2.4 GHz band with a wide band signal. The County said they wanted to work with us but to date ATN has never been contacted for any testing or talks concerning coordination between the County and ATN. ATN' has experience with helicopter video downlink transmissions in the 2.4 GHz band: The U.S. Army at its Fort Irwin Combat Training base (about 40 miles northeast of Barstow California) occasionally transmits analog FM video from its helicopter surveillance aircraft hovering above the battlefield training area. The Army's transmissions are snow free to almost snow free video via our Blueridge repeater about 100 miles distant. This also puts the Army transmissions on other ham band until a control operator turns off the repeater(s).

4. In paragraph 2 of the County's opposition the County stated that another significantly expanded monitoring study was undertaken. This study was performed at the 5 County sites to show utilization of the spectrum. The report is still fatally flawed as

it only shows activity level at the County's 5 sites for a few hours. No tests were made at ATN's sites other than Oat Mountain (adjacent to the County site). However the new County study is noteworthy. Many strong signals are indicated on the County's exhibits as follows: County SCC site: Exhibits 9, 10 & 11 show ATN's 2417 MHz links. RIH site: Exhibits 12, 18, 25, & 26 show ATN's Oat Mt. link and 2441 MHz ATV transmissions from Amateurs accessing the ATN repeater. ONK site: Exhibits 30, 36, & 41 show the Oat Mt. ATN link at full scale reading on the spectrum analyzer. RTH site: Exhibits 47, 49, 54, & 55 show one or more of ATN's 2417 MHz links. If the County ran the same type of spectrum test at Santiago Peak, the results would be more accurate of the utilization of the band in the Los Angeles area, as most of the 2.4 GHz links and 2441 MHz input signals are aimed toward Santiago Peak.

5. ATN and other amateur stations are extensively utilizing the 2402-2448 MHz band as indicated by the County's own Exhibits from their opposition. A grant of the County's experimental license would serve to create harmful interference to both the proposed County operations and existing Amateur operations, and should be grounds to dismiss the application as not meeting the Commissions Part 5.67(b) requirement to protect incumbent users of the spectrum.

Therefore for the forgoing reasons, the Amateur Television Network respectfully requests that the August 9, 1999 experimental application of the County of Los Angeles be denied.

Respectfully submitted,

Amateur Television Network

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