

Memorandum

To: Doug Young, OET, FCC
Cc: William Cross, WTB, FCC
Robert Gurss, Esquire
From: Chris Imlay
General Counsel, American Radio Relay League, Inc.

Though it is not the ARRL's intention to prolong this E-mail exchange, several points for the record are necessary in view of Mr. Gurss' message of yesterday afternoon:

1. ARRL is not "refusing to cooperate" with the Los Angeles Sheriff's Department regarding the pending STA request. The position of the ARRL is that this use, as proposed, will cause harmful interference to existing amateur radio uses in the Los Angeles area and the two uses are fundamentally incompatible. The ARRL is more than willing to cooperate with Los Angeles County to find alternative frequency bands that might be suitable for the County's proposed airborne video use. A meeting on that subject has been tentatively established for September 6, 2000 in Los Angeles.

2. The July 28, 2000 STA request for use of amateur frequencies is premised on a false assertion: that the use of the band 2450-2483.5 MHz pursuant to the County's Part 90 license has in some manner been made impossible by the broadcast auxiliary users. In fact, Mr. Howard Fine, Database Administrator for the Southern California Frequency Coordination Committee (SCFCC) has stated that the County will be immediately accommodated for downlinked video in that band during the Democratic National Convention upon notification to the coordinator for the need for the channel. Broadcast use of the relevant channel will be terminated to accommodate public safety use of the channel.

3. ARRL has no "general policy of preventing non-amateur use in amateur bands". There were, upon review of the Commission's public notices from January through May of this year, some 153 experimental authorizations granted, 30 of which proposed use of amateur bands. Only one, that of Los Angeles City (seeking the same facilities specified by the County here), has been opposed by ARRL, or other amateur groups. Countless STAs have been granted in amateur allocations, few with any interference potential. Typically, experimental facilities can be accommodated in amateur bands by amateurs. The County's use, however, for reasons set forth in our filings in opposition to the experimental authorization, are unusually intrusive, in a band used substantially, and on a daily basis, by radio amateurs.

4. The Amateur Service has provided communications, including video operations, in support of local public safety, for many years. Local radio amateurs are willing to continue this practice on a volunteer basis, using existing amateur facilities. If amateurs, using amateur equipment configured to operate in the existing Amateur Television repeater system in Los Angeles, provide such amateur communications, there will not be interference to those same networks. Amateurs know how to avoid interference in their own

bands because within the Amateur Service, there are established band plans and cooperative methods of interference avoidance.

5. Use by Los Angeles County of only the 2417-2450 MHz segment would not help the situation at all. There are amateur television repeater inputs throughout that segment and at least one output frequency. The fact that the Amateur Service allocation at 2417-2450 MHz is secondary, rather than primary, is irrelevant. There is no primary allocation there presently.

For the foregoing reasons, the American Radio Relay League, Incorporated continues to oppose any STA grant for airborne video downlinks in the 2402-2450 MHz band, or any portion thereof.

Chris Imlay