

**NARRATIVE STATEMENT
TO SUPPORT
APPLICATION FOR EXPERIMENTAL STA**

Pursuant to Section 5.61 of the Commission's Rules, PacifiCorp hereby requests a Special Temporary Authorization ("STA") in the Experimental Radio Service to support PacifiCorp's efforts to design a wide-area private land mobile radio ("PLMR) communications system on frequencies that are allocated under Part 80 for VHF Public Coast use. PacifiCorp is currently licensed under FCC Rule Part 80 to use certain VPC frequencies in its PLMR system but would now like to investigate whether other VPC frequencies, for which it is not currently licensed, can be used in its PLMR system without interference to maritime use of those same frequencies by MariTEL.¹

PacifiCorp is a multi-state electric utility operating in portions of Oregon, Washington, Idaho, California, Utah and Wyoming. PacifiCorp is currently designing and implementing a wide-area PLMR system for communications to support its electric operations using frequencies it has licensed under FCC Rule Parts 22, 80 and 90.

A. Purpose of Operation and Need for STA

PacifiCorp respectfully requests STA for a period of six months so that PacifiCorp can conduct tests that are intended to demonstrate that these additional VPC frequencies can be used for both land mobile and maritime service near common license area boundaries without harmful interference. This program of experimentation is important to ensure that implementation of PacifiCorp's channel re-use plan for its PLMR system will not result in actual interference to MariTEL's maritime operations in adjacent operating areas. PacifiCorp has received written permission from MariTEL (attached) to conduct these experiments on frequencies authorized to MariTEL with the understanding that transmissions will be monitored and will cease upon notification of harmful interference. If the tests are successful, PacifiCorp will be able to proceed with further planning towards implementation of its wide area PLMR network. The results of these experiments could also yield data that might be helpful to support PacifiCorp's request for waiver to take assignment of the license for these frequencies for land mobile operations near maritime areas.

¹ Call Signs WQPC660 and WQPC661.

B. Frequencies

STA is requested to use frequencies 157.2625 – 157.2875 MHz and 161.8625 – 161.8875 MHz, which correspond to VPC “Channel 85.” The lower frequencies will be used for mobile operations and the upper frequencies will be used for fixed base stations.

C. Locations

PacifiCorp proposes to use the frequencies at sites in the State of Oregon that are within 20 miles (32.2 km) of the coastlines of the Pacific Ocean and/or the Columbia River. MariTEL is the current licensee of the frequencies in this area, under call signs WPOJ532 and WPOJ536. MariTEL has granted its written consent to PacifiCorp’s conducting experiments on these frequencies in this area. The specific locations of the seventeen base stations to be used in these experiments are as follows:

Site Name	City (OR)	Lat (D-M-S)	Long (D-M-S)	Structure Type	Ground Elevation (m AMSL)	Structure Height (m AGL)	Antenna height to tip (m AGL)
RATTLESNAKE HILL	Union Gap	46-30-57.4	120-24-05.2	Steel Tower	609.6	15.2	16.2
DAYTON HILLTOP	Dayton	46-18-05.5	117-52-26.7	Wood Pole	946.4	36.6	36.6
CABBAGE HILL	Pendleton	45-35-24.4	118-34-58.8	Steel Tower	1052.0	26.1	29.0
Yale Dam Comm Site	Amboy	45-57-50.4	122-19-43.3	Steel Tower	203.0	3.5	11.6
PMOC	Portland	45-34-36.4	122-37-57.3	Steel Pole	6.1	36.6	39.6
MT SCOTT	Happy Valley	45-27-17.4	122-33-02.3	Steel Tower	330.4	42.7	39.6
TILLAMOOK HEAD	Seaside	45-57-07.3	123-56-18.4	Steel Tower	184.5	82.0	56.4
WASCO HILLTOP	Wasco	45-30-56.4	120-46-43.2	Steel Tower	730.3	12.2	16.2
WILLAMETTE PO	Albany	44-37-42.4	123-06-01.3	Steel Tower	65.2	43.4	45.7
SCOTT MOUNTAIN	Brownsville	44-23-55.6	122-51-51.5	Tower	649.8	21.3	24.4
OAR HILL	Lincoln City	44-58-47.3	124-00-31.4	Steel Tower	61.0	27.4	33.5
HARNESS MOUNTAIN	Sutherlin	43-31-20.4	123-06-25.2	Steel Tower	992.1	40.1	42.7
TILLER	Canyonville	42-54-20.5	122-57-41.9	Steel Tower	856.8	30.5	33.5
MT ISABELLE	Applegate	42-18-10.4	123-06-16.1	Steel Tower	1369.7	36.6	39.6
CAMP SIX	Crescent City	41-49-50.4	123-52-37.2	Tower	1147.0	38.1	41.2
GUNSIGHT PEAK	Baker City	41-44-18.0	122-46-30.0	Wood Pole	1808.1	13.3	16.5
Mt Bradley	Dunsmuir	41-20-42.4	122-11-44.8	Tower	1685.6	18.3	21.3

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D. Antenna Structures

All of the antennas to be used in these experiments are on structures that have already been reviewed and approved by the Federal Aviation Administration (“FAA”) or that do not require notice to or approval from the FAA due to height and/or distance from the nearest public use runway as determined with the FCC’s TOWAIR program and the FAA’s Notice Criteria Tool.

E. Contact Information

Questions regarding this application should be directed to:

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