

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the matter of)

CITY OF LOS ANGELES)

Application for Airborne Microwave)
Downlink Video Experimental License)
File # 0247-EX-PL-1999)

File No. _____

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

INFORMAL OBJECTION OF THE
AMATEUR TELEVISION NETWORK

The Amateur Television Network (ATN), an association of amateur radio operators utilizing television communications in the South Western part of the United States, pursuant to Section 1.41 of the Commission's Rules, ATN hereby respectfully Submits it's opposition and objection to the September 8, 1999 application for an airborne Microwave Downlink video experimental license, filed by the City of Los Angeles (the city) on FCC form 442. The application seeks authority to install and operate a microwave Downlink system for public safety video at 2402-2448 MHz, comprising a four-channel system utilizing video transmissions from helicopters. In the interest of ATN and the Amateur Radio Community in avoiding interference from the city's proposed system, ATN states as follows.

1. The City's "Findings" are questionable and no study was submitted. If the city had performed a proper study they would have found ATN's 2418 MHz link from Oat Mt. to Santiago Peak. The Mt. Lee site where the city conducted the test is almost in line with ATN's path to Santiago Peak. ATN has conducted a signal survey in the Mt. Lee area and we found a strong signal from our link at Oat Mt. The city should have picked up transmissions from Amateur Television Stations accessing several ATV repeaters in the Greater Los Angeles area as well as the large number of spread spectrum part 15 data radios occupying the band.
2. The City's "Theory Of Operation" states that "The experimental license will also alleviate the critical need for additional spectrum" ATN believes this statement is leading to a later reallocation of the band. No compatibility showing was submitted with the City's application. The City has failed to show how they intend to prevent their video downlinks from accessing ATN's video repeaters and links. On this basis alone ATN suggests that the City has failed to justify the grant of the authorization, especially one of this magnitude. ATN has several repeaters that are within range of airborne video from The City of Los Angeles. They are listed in the American Radio

Relay League's Repeater Directory, a public document, for sale at several radio stores in Southern California and other areas. It is amazing that the City failed to check the directory to confirm incumbent Amateur Radio Systems in the band and arrange for a compatibility study or testing between the City's proposed system and the several incumbent Amateur Repeaters and large number of Amateur Television stations.

3. The major problem with this proposal, however is absolutely no demonstration has been submitted with the City's application to show how the County's proposed system would avoid harmful interference to Amateur Service operations at 2402-2448 MHz. Several RACES and ARES groups use the ATN network to transport video from a disaster site to their county or city Emergency Operations Center. The City of Los Angeles and the California Air National Guard contacted ATN and asked permission to use the ATN repeaters during the trial of the LAPD officers accused of beating Rodney King several years ago. ATN agreed to share the use of the repeaters for experimental tests using an amateur on board the helicopter to operate the transmitter. The experiment was successful in obtaining snow free pictures into Oat and Santiago ATV repeaters from the helicopter as it flew several missions over the greater Los Angeles area for a period of two weeks. ATN has always supported the use of our linked repeaters for public safety but though the RACES program.
4. The City's Proposed system would seriously degrade ATN's ability to provide public service support to local and county government agencies. In Southern California the approximately one hundred Amateur Video Stations, most with transmitting equipment that operate within the 2402-2448 MHz spectrum would cause interference into the proposed City system making the system less than optimum for public safety use.
5. The purpose of an experimental license is to allow, manufactures, universities and researchers a way to field-test new technology equipment in the real world. The equipment and system design and utilization the City proposes is old existing technology and is the same as the broadcasters have used for the last few decades. Public Safety organizations do need some spectrum for airborne video. ATN suggests that the City look at spectrum below 2390 MHz for utilization as an alternative to the heavily encumbered 2402-2408 MHz Amateur Radio Band or one or more of the soon to be reallocated to Public Safety upper UHF TV channels.
6. Therefore, for the forgoing reasons, the Amateur Television Network respectfully requests that the September 8, 1999 experimental application file # 0247-EX-PL-1999 of the City of Los Angeles be denied.

Respectfully submitted,
THE AMATEUR TELEVISION NETWORK

By: Michael V. Collis
Michael V. Collis
Vice President

November 23, 1999