

BOARD OF DIRECTORS

Attachment 2



- B. AMBROSENOPresident
- W.N. DEANVice President
- L.F. FEHLNERSecretary
- C.S. ANDRENTreasurer
- R. ABRACZINSKAS
- P.D. ABRAMSON
- J.M. BEUKERS
- G.A. GUTMAN
- G.G. HAROULES
- L.D. HIGGINBOTHAM
- W.H. HILBUN III
- J. ILLGEN
- V.L. JOHNSON
- E.L. MCGANN
- B.J. UTTAM
- J.P. VAN ETTEN
- V.I. WEIHE

WILD GOOSE ASSOCIATION

October 24, 1980

MINUTES OF THE 46th BOARD OF DIRECTORS MEETING

The meeting was held in the Bradford Hotel, Boston, Massachusetts, following the Ninth Annual Wild Goose Technical Symposium on October 24, 1980. The following Directors were present:

- L. D. Higginbotham
- V. L. Johnson
- W. N. Dean
- W. H. Hilbun, III
- C. S. Andren
- J. P. Van Etten
- B. J. Uttam
- B. Ambroseno

Agenda Item 1 - Call to order

President, B. Ambroseno, called the meeting to order at 3:00 p.m.

Agenda Item 2 - Minutes of previous meeting

Mr. Ambroseno read the minutes of the 45th Board of Directors Meeting. Minutes were reviewed. Secretary's report was then accepted.

Agenda Item 3 - Treasurers Report

Mr. Andren read the Treasurers Report. The Board reviewed the report and accepted without additions or corrections.

Agenda Item 4 - Other Business

Mr. Higginbotham has again requested that we establish a permanent mailing address for the WGA.

Standing Committee Reports

1. Executive - No Report
2. Constitution - No Report
3. Membership - 1981-563 paid, 95 delinquent 1979 mailing list 658

Mr. Higginbotham will try to get dues notices out before the end of February. Mr. Higginbotham plans to do the mailing himself because last year they were sent indiscriminately by C D S I.

Special Committee Reports

1. Congressional Liason - No new information
2. FAA Certification - No Report
3. Loran WGA Specifications - No Report


B. Ambroseno

BOARD OF DIRECTORS

Attachment 3



B. AMBROSENO President
W.N. DEAN Vice President
L.F. FEHLNER Secretary
C.S. ANDREN Treasurer
R. ABRACZINSKAS
P.D. ABRAMSON
J.M. BEUKERS
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V.I. WEIHE

WILD GOOSE ASSOCIATION

4 Townsend Road
Acton, MA 01720

December 31, 1980

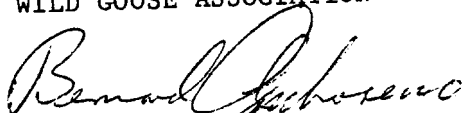
Sec. William J. Tricarico
Federal Communications Commission
1919 M Street
Washington, DC 20554

Dear Mr. Tricarico:

The WGA presents the attached comments regarding the Petition for Rule Making of the Utilities Telecommunications Council (UTC) RM-3747.

Sincerely,

WILD GOOSE ASSOCIATION


Bernard Ambroseno
President

cc: Mr. George Sarver, FCC

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the matter of)
)
Amendment of Parts 2, 14, and)
90 of the Rules to provide) RM-3747
regulatory recognition and)
protection for power line)
carrier operations of electric)
utilities in the band 10-490 KHz)


The Wild Goose Association (WGA) submits comments on the Petition for Rule Making of the Utilities Telecommunications Council (UTC).

The WGA is an association formed to provide an organization for individuals who have a common interest in Loran and who wish to foster and preserve the art of Loran, to promote the exchange of ideas and information in the field of Loran, to recognize the advances and contributions to Loran, to document the history of Loran, and to commemorate fittingly the memory of fellow Wild Geese.

COMMENTS

1. The WGA is opposed to any organization being given the authority to control such a large spectrum of frequencies (10-490) KHz for purposes of Power Line Carrier (PLC) Systems.
2. The WGA is opposed to interferences generated by long power line carrier systems. This interference will degrade the operation of the Loran C (90-110) KHz navigation system and those bands containing radio navigational beacons.
3. The FCC should protect the allocated frequency band for the Loran C navigation system which has been selected by the U.S. Government as the prime system for the coast and confluence zones of the United States.

4. The FCC should consider the work being performed by the D.O.T. utilizing Loran C for position fixing for land vehicles and that both emergency vehicles and aircraft will be in the PLC environment. The FCC should be concerned about a wideband signal interference to authorized transmissions nationwide.
5. The WGA requests that a representative of the WGA be invited to those hearings that may take place in regards to this Rule Making.



Bernard Ambroseno

President, WGA

BOARD OF DIRECTORS

Attachment 4



- B.J. UTTAM President
- V.L. JOHNSON Vice President
- B. AMBROSENO Secretary
- C.S. ANDREN Treasurer
- R. ABRACZINSKAS
- P.D. ABRAMSON
- J.M. BEUKERS
- W.N. DEAN
- L.F. FEHLNER
- G.A. GUTMAN
- G.G. HAROULES
- L.D. HIGGINBOTHAM
- W.H. HILBUN III
- E.L. MCGANN
- J.P. VAN ETTEN
- V.I. WEIHE

WILD GOOSE ASSOCIATION

TREASURER'S REPORT January 7, 1981

Previous balance \$ 1,627.02


<u>Receipts</u>	\$	<u>Transactions</u>	
Dues	282.50		
Journal Sales	137.00		
Con. Hospitality			
Receipts	600.00		
Convention			
Registration	7,887.50		
Journal Ads			
1979	<u>1,458.25</u>		
		\$10,365.25	
			\$ 11,992.27


Expenditures

Membership Exp.	986.99		
Stationary Expense	68.46		
Awards Expense	198.37		
Convention			
Chairman-Adv.	<u>5,000.00</u>		
		\$ 6,253.82	
Balance as of 1/7/81			\$ 5,738.45

Submitted 1/7/81

Approved by Board of Directors


 Carl S. Andren
 Treasurer


 L.F. Fehlner
 Secretary

Outstanding Transaction:

1978 Ad Monies to be received:	\$645.00
1979 Ad Monies to be received:	\$2,732.50

Attachment 5

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Amendment of Parts 2, 15, and)
90 of the Rules to provide) RM-3747
regulatory recognition and)
protection for power line)
carrier operations of electric)
utilities in the band 10-490 kHz)

Megapulse, Inc., submits comments on the Petition for Rule Making of the Utilities Telecommunications Council (UTC).

Megapulse is a company whose primary business activity is supplying equipment and services used for radionavigation and position-fixing. Within the frequency range addressed by UTC, Megapulse is specifically concerned with the Loran-C operating band of 90-110 kHz. Some of our comments apply to the general scope, intent, and content of the UTC petition.

COMMENTS

1. The UTC petition ostensibly seeking "appropriate regulatory recognition of and protection for electric power utility Power Line Carrier (PLC) systems in the bands 10-490 kHz" (Petition p.1) is clearly the act of an aggressor seeking in one action

(a) to attain equal status with users for whom the primary use of the bands in question has been historically reserved;

(b) to extend the allowed frequency range of UTC/PLC operations;

(c) to move to a status where their use in the future of increased signal

power levels and other possibly damaging activities would be less restricted;
and

(d) to shift a significant portion of the financial and technical burden of their frequency management tasks to others.

2. UTC suggests that the FCC implement the proposed rule-making by first determining the policy issues and then evaluating the technical, financial, and operational implications. UTC has it backwards. The resolution of policy issues must follow evaluation of technical data and determination of the financial and operational impact of UTC's proposal on existing and potential users of the bands sought to be appropriated by UTC. Any rule adopted as a result of the UTC petition would be a definition of policy. That definition must be based upon, not followed by, a thorough evaluation of all determinative factors.

3. The superficiality and errors in the technical comments presented by UTC point up the need for a careful evaluation of this subject matter. For instance:

(a) UTC attempts to mislead the FCC and the public by stating: "Interference from PLC systems to radio or radionavigation receivers can take place only within proximity (less than 1 mile) of the transmission line" (Petition p.4). No such conclusory statement can be made without defining what constitutes interference, the type and power of the radiated signal, the type and quality of the receiver, the purpose of the operation, etc.

(b) Even if the range of interference were one mile, the numbers and configurations of electric utility lines are such that in many areas a conflicting user could never be farther than one mile from a utility line. This

would be especially true if PLC signals were used in every neighborhood for "residential load management and time-of-day metering," as suggested by UTC (Petition p.7).

(c) UTC's statement that "prevention of this interference is easily accomplished with accurate foreknowledge of the frequency and site coverage of the radio facility" (Petition p.4) completely loses sight of the use of highly mobile radio and navigation receivers, which can not be expected at all times to keep away from utility wires.

4. Contrary to UTC statements, existing PLC systems have been found to cause significant interference--including complete operational failure--with Loran-C receivers. This has been evidenced in tests by the United States Department of Transportation, agencies of the State of Tennessee, and various Loran-C equipment manufacturers. That interference could well prevent the provision of necessary fire and police protection or medical services in the evolving area of emergency vehicle location systems. Interference with Loran-C navigational instrumentation of aircraft operating above the power lines controlled by PLC could be disastrous to public safety. Clearly, both emergency vehicles and aircraft will often be within, near, or above the PLC grids.

5. By seeking primary status under Parts 2 and 90, UTC's apparent purpose is to avoid its present responsibility under Part 15.7 of the Rules: "In the event harmful interference is caused, the operator of the apparatus shall promptly take steps to eliminate the harmful interference." UTC is saying, in effect, that its own interests take precedence over the public interest in maintaining adequate safety standards.

RECOMMENDATIONS

1. That FCC seek a much broader base of comments on this far-reaching petition. The absence of comment from parties who should be interested (e.g., the United States Department of Transportation (Coast Guard/Federal Aviation Administration)) is quite unusual considering the scope and possible impact of this petition. The participation of concerned agencies should be solicited by the FCC.

2. That FCC and other interested agencies, prompted by this petition, prepare a five-year plan wherein PLC operations would be prohibited in frequency bands where the increasing applications warrant removal of even the present UTC secondary status. For instance, the Loran-C band of 90-110 kHz should be kept clear of all PLC, as should those bands containing navigational beacons, the users of which can not be unequivocally assured of immunity from interference caused by PLC.

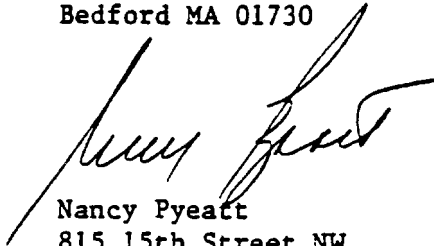
3. That FCC consider the broad implication of this UTC petition, which appears to be aimed at establishing a private communications network along the electric utility grids. It may be that control of the utilities ought to be accomplished via existing regulated communications channels, to the extent possible. Those channels might be complemented by special communications links established in parallel with the utility lines but conforming to extant regulations. This approach would obviate the need for new regulations and stop encroachment of the

UTC/PLC on other portions of the valuable spectrum allocated to radionavigation and position-fixing applications.



E. L. McGann
Executive Vice President
Megapulse, Inc.
8 Preston Court
Bedford MA 01730

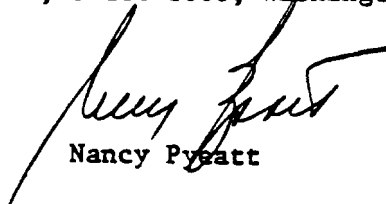
December 17, 1980



Nancy Pyeatt
815 15th Street NW
Washington DC 20005
347-4332
Attorney for Megapulse, Inc.

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing "Comments" of Megapulse, Inc., was served this 17th day of December 1980 by prepaid first class mail addressed to Charles M. Meehan, Esquire, Keller & Heckman (attorneys for Petitioner, Utilities Telecommunications Council), 1150 17th Street NW, Suite 1000, Washington DC 20036.



Nancy Pyeatt