

telecommunications industry in a "brinkmanship" manner that invokes last minute relief through the channels in the regulations.

Some examples of the problems we have experienced are installation and repair vehicles running out of gas and being towed back to garages, siphoning and transporting gasoline in large drums in pick-up trucks between garages and in general expending a great deal of time and effort in apportioning inadequate supplies between locations in a near crisis atmosphere. If these vehicles were not kept in operation customers would have been without telephone service. These problems were further complicated by some suppliers only wanting to supply us needed gasoline when we declared that we had a disruption of normal service. In effect we were expected to wait until service was disrupted before we would obtain needed supplies. These conditions could have been alleviated had the definition of "telecommunications services" been corrected. The current definition of "telecommunications services" jeopardizes the Bell System's ability to meet the telecommunications needs of this country.

The definition of "telecommunications services" is still not in keeping with the intent of the Regulations. It is our considered opinion that it was the intent of the Congress in drafting the legislation that led to the "Petroleum Allocation Regulations", "that the President will pay special attention to the need of continuing the maintenance of public services without disruption or interruption". However, the definition as written containing the clause "during periods of substantial disruption of normal service" is contradictory to the intent of the Regulations and seriously undermines the dedication to excellence of service the telecommunications industry has worked so diligently to achieve and to which this Nation is entitled and has grown to expect. The telecommunications services of our Country cannot afford to be in a disruptive state before receiving an adequate supply of energy.

This opinion is further substantiated by referring to the Emergency Petroleum Allocation Act of 1973, Section 4(b) (1) (B) wherein it states that the regulation shall provide for:

"Maintenance of all public services (including facilities and services provided by municipally, cooperatively, or investor owned utilities or by any State or Local Government or authority, and including transportation facilities and services which serve the public at large)."

Telecommunications services can clearly be defined as a public utility and also as a service which serves the public at large.

Page 12 of the Conference Report No. 93-628, dated November 10, 1973, accompanying S1570, expands on the above quoted Section 4(b) as follows:

"For example, in the emergency period a high priority has been assigned to the maintenance of public services including those provided by government and utilities--whether privately, publicly, municipally, or cooperatively owned. It is expected that the President will pay special attention to the need of continuing these services without disruption or interruption. Allocations to utilities, in particular, should be made to the extent necessary to preserve the reliability of our utility services.

The objective set forth in the Emergency Petroleum Act of 1973, and the Conference Report clearly states the need for preserving reliable services at all times.

We, therefore, strongly urge that the definition of "Telecommunication Services" be amended to read as follows:

"Telecommunications services" is the provision of voice, data, telegraph, and similar communication services to the public by a common carrier.

Subpart A - General Provisions

Section 211.10

We have a favorable opinion of this revision which allows for a state or local government to permit or authorize suppliers, gas stations particularly, to grant allocations and priorities of gasoline to priority end users. This is most important to us for we purchase approximately forty-five per cent of our annual needs of 180 million gallons from gas stations.

Subpart F - Motor Gasoline

This subpart omits "telecommunications services" as a priority user. The current Petroleum Allocation and Price Regulations, Subpart F - Motor Gasoline Section 211.103 Allocation Levels, states in part as follows:

"(1) One hundred (100) per cent of current requirements for the following uses:

(v) telecommunications services.

Also, Subparts D, E, G, H, I, and K of this Regulation recognize "Telecommunications Services" as a priority consumer.

Judging from the numbering of the priority uses listed under Paragraph (c) it appears that "telecommunications services" was inadvertently omitted. Paragraph (iv) is omitted where "telecommunications services" appears in the current Regulations. We point out this apparent inadvertent omission of telecommunications services and respectfully request its reinstatement.

Subpart H - Aviation Fuels

We were pleased to find that "telecommunications flying" was included as a use that is to receive priority consideration.

Energy Conservation

Let us again assure the Federal Energy Office that the management of the Bell System is dedicated to the National goal of reducing energy consumption consistent with providing reliable telecommunication services. We have a comprehensive energy conservation program in effect and are diligently measuring the results on a monthly basis. Energy conservation and measurement has been integrated into the Basic Management Job in the Bell System and will continue to be emphasized as far as we can see into the future.

We thank you for your consideration of our comments and emphasize that our concern is that our capability for furnishing telecommunications services to our Country not be impaired or jeopardized.

If we in the Bell System can be of any further assistance, please contact Mr. Henry M. Williams in our Washington Office (telephone 466-5563) or Mr. Michael Del Grande in our New York Office (telephone 212-393-3691).

Sincerely,

A R Keitz

H

OFFICE OF TELECOMMUNICATIONS POLICY

EXECUTIVE OFFICE OF THE PRESIDENT

WASHINGTON, D.C. 20504

July 1, 1974

DIRECTOR

Mr. John C. Sawhill
Administrator
Federal Energy Office
Washington, D.C. 20034

Dear Mr. Sawhill:

This is in reference to the fuel allocation rules recently adopted by the Federal Energy Office.

The Office of Telecommunications Policy is responsible for coordinating the telecommunications activities of the Federal Government, evaluating the capability of telecommunications systems to meet national security and emergency preparedness requirements, and coordinating policies, plans, and procedures for utilizing telecommunications resources in an emergency.

All government departments and agencies, including the Department of Defense, are heavily dependent upon leased services from the communications common carriers. These services are vital to our national security, and many special procedures have been adopted to insure continuous service without interruption.

I am concerned about the effect of the fuel allocation rules on the ability of communications common carriers to continue to provide these vital services. The present rules appear to permit communications common carriers to obtain the same fuel allocation level during normal operating periods as all other commercial services. Because of the restrictive definition of the term "telecommunications services," the carriers would be entitled to a higher allocation level only during periods of "substantial disruption of normal service." Moreover, even at this higher level, the allocation would be subject to reduction by the application of an "allocation fraction."

These rules do not appear to reflect the intent of Congress in enacting the Emergency Petroleum Allocation Act of 1973, P.L. 93-159, to the effect that a high priority should be assigned to essential public services, including those provided by investor-owned utilities, so that service will be continued without disruption. This priority is not reflected by affording telecommunications services the same allocation treatment as all other commercial services during periods of normal

operation. In addition, the application of an allocation fraction, which might be substantial in times of acute fuel shortages, could precipitate, or at least contribute to, the service disruptions that Congress has sought to avoid.

I therefore recommend that the allocation rules for telecommunications services be modified to reflect the essential nature and priority needs of these services, both to the Federal Government and to the public, and to insure that communications common carriers receive no less fuel than is required to maintain normal service and prevent disruption or interruption.

I hope that you will give this matter your immediate attention. Please feel free to call me or my staff if you have any questions on this matter.

Sincerely,



Clay T. Whitehead

A

SUMMARY CHRONOLOGY -- VHF-TV-DROP-IN

1. October 1973: Part of OTP mandate is to "develop in coordination with the FCC, a comprehensive long-range plan for improved management of all electromagnetic resources." In an effort to suggest ways of improving the use of the VHF part of the spectrum, OTP issued its first technical analysis of VHF Television Broadcasting Frequency Assignment Criteria. This study suggested that 67 additional VHF-TV stations could be "dropped-in" in the top 100 television markets by taking advantage of existing technologies and techniques, e.g., directional antennas, precise frequency offset, etc., to reduce required separation criteria.
2. October 26, 1973: Senator Baker in a public statement to the press supports OTP study, indicates benefits for Tennessee.
3. January 24, 1974: Letter sent by OTP to FCC Chief Engineer, providing technical information on potential Drop-In locations, and revised separation criteria based on OTP study assumptions; these to be used in FCC VHF-TV computer assignment program.
4. March 1974: United Church of Christ petitioned FCC to add OTP drop-ins to assignment table; FCC put petition out for public comment.

5. May 14, 1974: OTP issued 2nd technical report, incorporating results of FCC Chief Engineer Office Computer Analysis.
Letter sent to Chairman, FCC, with second technical report attached. Conclusions basically the same as first study, i.e., VHF-TV assignment criteria should be reexamined since 20 years has passed since adoption (FCC's Sixth Report and Order of 1952) to assure effective use is being made of the spectrum in light of modern day engineering possibilities.
6. February/March 1975: FCC considering Notice of Inquiry.

B

OFFICE OF TELECOMMUNICATIONS POLICY
EXECUTIVE OFFICE OF THE PRESIDENT
WASHINGTON, D.C. 20504

DIRECTOR

May 14, 1974

Honorable Richard E. Wiley
Chairman
Federal Communications Commission
Washington, D. C. 20554

Dear Mr. Chairman:

Recently the Office of Communications of the United Church of Christ, et al., filed a Petition for Rulemaking to amend the television table of assignments to include additional VHF channels. We agree that the Commission should undertake a formal reevaluation of the present VHF assignment criteria and the VHF television table of assignments, with the goal of making available the largest possible number of additional VHF outlets in the major markets.

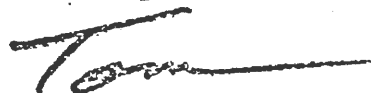
Since our first report on this matter in October, 1973, we have continued our studies and, with your staff's assistance, we have recently reevaluated the number of additional VHF-TV assignments that are possible, from an interference standpoint, in the top 100 markets of the United States. The results of this reevaluation are enclosed.

The analysis employed three different distance separation criteria, and used a data base of existing VHF assignments and a computer program supplied by your staff. The results of this analysis validate the primary finding of our original study, i.e., that there is no technical reason why a substantial number of additional VHF-TV channels cannot be assigned in the top 100 markets.

Many of the additional assignments could be located sufficiently near the principal communities of the designated markets to enable so-called "city grade" service to those communities, as required by the Commission's rules. In cases where this requirement could not be met, the channel could be assigned to an outlying community and still provide substantial service to the principal community of the market.

I hope that this further analysis will be of assistance, and I look forward to working with you in this important area of spectrum planning. Should you desire any additional information, please let me know.

Sincerely,

A handwritten signature in dark ink, appearing to read "Tom", with a long horizontal stroke extending to the right.

Clay T. Whitehead

Enclosure

FURTHER EVALUATION OF ADDITIONAL
VHF-TV CHANNELS THAT COULD BE
ASSIGNED IN THE TOP 100 MARKETS

This report presents the results of a further analysis of the number of additional VHF-TV channels that could possibly be assigned in or near the top 100 television markets in the United States. The analysis was conducted for three different separation reductions, using a data base of existing VHF assignments supplied by the FCC's Office of Chief Engineer. Computation was performed by means of a computer program that was also provided by the FCC.

In 1952, the FCC adopted the following minimum separation distances between co-channel and adjacent channel VHF-TV operations:

<u>ZONE</u>	<u>CO-CHANNEL SEPARATION</u>	<u>ADJACENT CHANNEL SEPARATION</u>
I (N.E. U.S.)	170 miles	60 miles
II (Western U.S.)	190 miles	60 miles
III (Southern U.S.)	220 miles	60 miles

Over the years, the Commission has allowed several exceptions to these existing criteria on a case-by-case basis. For example, Channel 3, Jackson, Mississippi, is located approximately 175 miles from Channel 3, Mobile, Alabama, a 20% reduction in the applicable standard. Similarly, Channel 6, Providence, R.I., is located approximately 155 miles from Channel 6, Portland, Me., representing a 10% reduction.

There is evidence to indicate that the existing separation distances are conservative and that they could be relaxed without affecting existing VHF-TV station operations, thereby permitting the assignment of additional channels. The present analysis evaluated the effects of the following three reductions in the existing distance separation criteria:

- I. Reduction of existing FCC criteria for co-channel and adjacent channel separation by 10%.
- II. Reduction of existing FCC criteria for both co-channel and adjacent channel separation by 15%. The additional 5% reduction assumes the use of directional antennas.

- III. Reduction of existing FCC criteria for adjacent channel separation by 15% and co-channel separation by 17.65%. The additional 2.65% reduction in co-channel separation assumes the use of precise frequency offset.

The FCC computer program required that geographic coordinates be identified for each hypothetical additional channel assignment. Coordinates were chosen within a zone generally consistent with the normal distances of existing VHF stations from the cities principally served. However, the selection of a precise location within that zone was necessarily arbitrary. Therefore a possible additional assignment that came within a fraction of a mile of being consistent with the applicable reduced separation criteria would have been excluded by the computer as a possible additional channel. Because such marginal situations might be worthy of further evaluation, all potential channel assignments that did not exceed the reduction criteria by more than five miles were identified.

The data base provided by the FCC included all existing VHF-TV channel assignments irrespective of whether construction permits or licenses had been granted. To determine the effect of unused channel assignments on the number of possible drop-ins alternative analyses were performed for each separation criteria using (1) all existing assignments and (2) only those assignments for which construction permits or licenses have been granted. The consideration of unused channel assignments in this analysis should not be construed as an endorsement of the deletion of all such assignments in favor of new channels in the top 100 markets. Rather, it is recognized that each such case must be evaluated on its merits.

The results of the analyses are presented in the attached tables. Tables I, II, and III show the assignments that are possible under each of the three separation categories. Within each category, the additional assignments that would be possible if unused existing assignments were deleted from the present Table of Assignments are shown separately. Also, those situations where the location of the potential drop-in fell short of the reduced criteria by five miles or less are indicated by an asterisk. Table IV is a summary of the results for all three reduced distance separation categories.

TABLE I

**POSSIBLE ADDITIONAL VHF-TV CHANNEL ASSIGNMENTS IN TOP
100 MARKETS WITH A 10% REDUCTION IN CO-CHANNEL AND
ADJACENT CHANNEL SEPARATION CRITERIA**

The following VHF-TV channel assignments are possible in the top 100 markets with a 10% reduction in co-channel and adjacent channel separation criteria; considering all existing VHF-TV assignments:

<u>MARKET (RANK)</u>	<u>CHANNEL</u>	<u>MARKET (RANK)</u>	<u>CHANNEL</u>
San Francisco (7)	12*	Springfield, Il. (74)	6
Miami (18)	13	Portland, Me. (75)	3*
Atlanta (19)	4*	Jackson, Miss. (77)	5
Kansas City (23)	12*	Jackson, Miss. (77)	10
Milwaukee (25)	8*	Columbia, S. C. (82)	8*
Portland (30)	4*	Fresno (84)	4
Nashville (33)	10	Fresno (84)	5
Johnstown, Pa. (34)	12*	Fresno (84)	7
Birmingham (35)	3*	Fresno (84)	10
Albany (43)	4*	Fresno (84)	13
Charlestown (48)	2*	South Bend (85)	12
Charlestown (48)	11	Evansville (91)	5
Salt Lake City (53)	10*	Wilmington (95)	8
Wichita (62)	5	Wilmington (95)	10
Shreveport (66)	11*	Monroe (100)	4
Mobile (69)	9	Monroe (100)	11
Davenport (71)	11*		

TOTAL: 33

The following additional VHF-TV channel assignments are possible under the 10% reduction criteria when only those existing assignments for which construction permits or licenses have been granted are considered:

Dallas (11)	2	Fresno (84)	2
Denver (39)	12	Fresno (84)	9
Salt Lake City (53)	13	Sioux Falls (92)	12
Little Rock (68)	9	Albuquerque (97)	2
Little Rock (68)	13	Albuquerque (97)	9
Green Bay (70)	8	Albuquerque (97)	11

TOTAL: 12

*Indicates that the location selected for the potential channel assignment fell short of the reduced separation criteria by five miles or less.

POSSIBLE ADDITIONAL VHF-TV CHANNEL ASSIGNMENTS IN TOP
100 MARKETS WITH A 15% REDUCTION IN CO-CHANNEL AND
ADJACENT CHANNEL SEPARATION CRITERIA

The following VHF-TV channel assignments are possible in the top 100 markets with a 15% reduction in co-channel and adjacent channel separation criteria, considering all existing VHF-TV assignments:

<u>MARKET (RANK)</u>	<u>CHANNEL</u>	<u>MARKET (RANK)</u>	<u>CHANNEL</u>
San Francisco (7)	12*	Shreveport (66)	2
Dallas (11)	9*	Shreveport (66)	11
Seattle (15)	3*	Mobile (69)	9
Miami (18)	3*	Davenport (71)	11
Miami (18)	13	Springfield, Il. (74)	6
Atlanta (19)	4	Jackson, Miss. (77)	5
Houston (22)	5*	Jackson, Miss. (77)	8
Kansas City (23)	8	Jackson, Miss. (77)	10
Kansas City (23)	12	Columbia, S. C. (82)	8*
Milwaukee (25)	8	Fresno (84)	4
Dayton (28)	11*	Fresno (84)	5
Memphis (32)	12*	Fresno (84)	7
Nashville (33)	10	Fresno (84)	9
Johnstown, Pa. (34)	5*	Fresno (84)	13
Johnstown, Pa. (34)	12	South Bend (85)	4
Birmingham (35)	3	South Bend (85)	12
Greenville (36)	2*	Paducah (90)	10
Albany (43)	4	Evansville (91)	5
Charlestown (48)	2	Evansville (91)	12
Charlestown (48)	11	Sioux Falls (92)	7
Salt Lake City (53)	10	Binghamton (94)	4
Salt Lake City (53)	13*	Wilmington (95)	8
Norfolk (55)	5	Wilmington (95)	10
Salinas (61)	10*	Monroe (100)	4
Wichita (62)	5		

TOTAL: 49

The following additional VHF-TV channel assignments are possible under the 15% reduction criteria when only those existing assignments for which construction permits or licenses have been granted are considered:

Dallas (11)	2	Springfield, Il. (74)	1
Denver (39)	12	Fresno (84)	1
Salt Lake City (53)	3	Sioux Falls (92)	
Salt Lake City (53)	6	Albuquerque (97)	
Salt Lake City (53)	8	Albuquerque (97)	1
Little Rock (68)	9	Albuquerque (97)	
Little Rock (68)	13		

TOTAL: 13

*Indicates that the location selected for the potential channel assignment fell short of the reduced separation criteria by five miles or less.

**POSSIBLE ADDITIONAL VHF-TV CHANNEL ASSIGNMENTS IN TOP 100
MARKETS AT 15% REDUCTION IN CO-CHANNEL AND A 17.65%
REDUCTION IN ADJACENT CHANNEL SEPARATION CRITERIA**

The following VHF-TV channel assignments are possible in the top 100 markets at a 15% reduction in co-channel and a 17.65% reduction in adjacent channel separation criteria, considering all existing VHF-TV assignments

<u>MARKET (RANK)</u>	<u>CHANNEL</u>	<u>MARKET (RANK)</u>	<u>CHANNEL</u>
Chicago (3)	4*	Phoenix (57)	7*
San Francisco (7)	12*	Salinas (61)	10
Cleveland (9)	12	Wichita (62)	5
Pittsburgh (10)	8*	Shreveport (66)	2
Dallas (11)	9*	Shreveport (66)	11
Seattle (15)	3*	Little Rock (68)	6*
Seattle (15)	10*	Mobile (69)	9
Miami (18)	3*	Davenport (71)	10*
Miami (18)	13	Davenport (71)	11
Atlanta (19)	4	Springfield, Il. (74)	6
Indianapolis (21)	3*	Portland, Me. (75)	3
Houston (22)	5	Jackson, Miss. (77)	5
Kansas City (23)	8	Jackson, Miss. (77)	8
Kansas City (23)	12	Jackson, Miss. (77)	10
Milwaukee (25)	8	Columbia, S. C. (82)	8*
Dayton (28)	11*	Fresno (84)	4
Portland, Ore (30)	4*	Fresno (84)	5
Memphis (32)	12*	Fresno (84)	7
Nashville (33)	10	Fresno (84)	9
Johnstown, Pa. (34)	5*	Fresno (84)	13
Johnstown, Pa. (34)	12	South Bend (85)	4
Birmingham (35)	3	South Bend (85)	12
Greenville (36)	2*	Chattanooga (88)	7*
Grand Rapids (42)	11*	Springfield, Mo. (89)	9
Albany (43)	4	Springfield, Mo. (89)	11
Louisville (47)	6*	Paducah (90)	10*
Louisville (47)	10*	Evansville (91)	5
Charlestown (48)	2	Evansville (91)	12
Charlestown (48)	11	Sioux Falls (92)	6
San Diego (52)	2*	Sioux Falls (92)	7
San Diego (52)	4*	Binghamton (94)	7
Salt Lake City (53)	8	Wilmington (95)	8
Salt Lake City (53)	10	Wilmington (95)	10
Salt Lake City (53)	13	Monroe (100)	4
Norfolk (55)	5		

TOTAL: 69

The following additional markets are considered under this criterion when only those existing assignments for which construction permits or licenses have been granted are considered:

MARKET (RANK)	CHANNEL	MARKET (RANK)	CHANNEL
Dallas (11)	2	Little Rock (68)	13
Denver (39)	12	Springfield, Il (74)	13*
Salt Lake City (53)	3	Fresno (84)	2
Salt Lake City (53)	6	Sioux Falls (92)	12
Salt Lake City (53)	12*	Albuquerque (97)	2
Little Rock (68)	8*	Albuquerque (97)	9
Little Rock (68)	9	Albuquerque (97)	11

TOTAL: 14

*Indicates that the location selected for the potential channel assignment fell short of the reduced separation criteria by five miles or less.

POSSIBLE ADDITIONAL VHF-TV CHANNEL ASSIGNMENTS IN TOP 100 MARKETS
FOR VARYING SEPARATION DISTANCE CRITERIA

MARKET (#)	CHANNEL	REDUCTION OF SEPARATION DISTANCE CRITERIA											
		10%				15%				17.65%			
		IN		OUT		IN		OUT		IN		OUT	
		A	B	A	B	A	B	A	B	A	B	A	B
Chicago (3)	4										X		X
San Francisco (7)	12		X		X		X		X		X		X
Cleveland (9)	12									X		X	
Pittsburgh (10)	8										X		X
Dallas (11)	2			X				X				X	
	9						X		X		X		X
Seattle (15)	3						X		X		X		X
	10										X		X
Miami (18)	3						X		X		X		X
	13	X		X		X		X		X		X	
Atlanta (19)	4		X		X	X		X		X		X	
Indianapolis (21)	3										X		X
Houston (22)	5						X		X	X		X	
Kansas City (23)	8					X		X		X		X	
	12		X		X	X		X		X		X	
Milwaukee (25)	8		X		X	X		X		X		X	
Dayton (28)	11						X		X		X		X
Portland (30)	4		X		X						X		X
Memphis (32)	12						X		X		X		X
Nashville (33)	10	X		X		X		X		X		X	
Johnstown, Pa. (34)	5						X		X		X		X
	12		X		X	X		X		X		X	
Birmingham (35)	3		X		X	X		X		X		X	
Greenville (36)	2						X		X		X		X
Denver (39)	12			X				X				X	
Grand Rapids (42)	11										X		X
Albany (43)	4		X		X	X		X		X		X	
Louisville (47)	6										X		X
	10										X		X
Charlestown (48)	2		X		X	X		X		X		X	
	11	X		X		X		X		X		X	
San Diego (52)	2										X		X
	4										X		X
Salt Lake City (53)	3							X				X	
	6							X				X	
	8							X		X		X	
	10		X		X	X		X		X		X	
	12												X
	13			X			X	X		X		X	
Norfolk (55)	5					X		X		X		X	
Phoenix (57)	7										X		X
Salinas (61)	10						X		X	X		X	
Wichita (62)	5	X		X		X		X		X		X	
(Hutchinson)													

KEY - A = The locations selected for the potential channel assignments listed in Column A meet the specified reduced separation criterion.

B = The locations selected for the potential channel assignments listed in Column B fell short of the specified reduced separation criterion by five miles or less.

IN = All VHF-TV assignments included in the data base.

OUT = Unused VHF-TV assignments excluded from the data base.

TABLE IV

PAGE 2

POSSIBLE ADDITIONAL VHF-TV CHANNEL ASSIGNMENTS IN TOP 100 MARKETS
FOR VARYING SEPARATION DISTANCE CRITERIA

MARKET (#)	CHANNEL	REDUCTION OF SEPARATION DISTANCE CRITERIA											
		10%				15%				17.65%			
		IN		OUT		IN		OUT		IN		OUT	
		A	B	A	B	A	B	A	B	A	B	A	B
Shreveport (66)	2					X		X		X		X	
	11		X		X	X		X		X		X	
Little Rock (68)	6										X		X
(Texarkana)	8												X
	9			X				X				X	
	13			X				X				X	
Mobile (69)	9	X		X		X		X		X		X	
Green Bay (70)	8			X									
Davenport (71)	10										X		X
	11		X		X	X		X		X		X	
Springfield, Ill. (74)	6	X		X		X		X		X		X	
	13								X				X
Portland, Me. (75)	3		X		X					X		X	
Jackson, Miss. (77)	5	X		X		X		X		X		X	
	8					X		X		X		X	
	10	X		X		X		X		X		X	
Columbia, S.C. (82)	8		X		X		X		X		X		X
Fresno (84)	2			X				X				X	
	4	X		X		X		X		X		X	
	5	X		X		X		X		X		X	
	7	X		X		X		X		X		X	
	9			X		X		X		X		X	
	10	X											
	13	X		X		X		X		X		X	
South Bend (85)	4					X		X		X		X	
	12	X		X		X		X		X		X	
Chattanooga (88)	7										X		X
Springfield, Mo. (89)	9									X		X	
	11									X		X	
Paducah (90)	10						X		X		X		X
Evansville (91)	5	X		X		X		X		X		X	
	12						X		X	X		X	
Sioux Falls (92)	6										X		X
(Mitchell)	7						X		X	X		X	
	12			X				X				X	
Binghamton (94)	4						X		X				
	7										X		X
Wilmington (95)	8	X		X		X		X		X		X	
	10	X		X		X		X		X		X	
Albuquerque (97)	2			X				X				X	
	9			X				X				X	
	11			X				X				X	
Monroe (100)	4	X		X		X		X		X		X	
	11	X		X									
TOTALS		19	14	20	14	33	16	46	16	43	26	54	29
SUMMED TOTALS		33		44		49		62		69		83	

KEY - A = The locations selected for the potential channel assignments listed in Column A meet the specified reduced separation criterion.

B = The locations selected for the potential channel assignments listed in Column B fell short of the specified reduced separation criterion by five miles or less.

IN = All VHF-TV assignments included in the data base.

OUT = Unused VHF-TV assignments excluded from the data base.

C

RECEIVED

OFFICE OF TELECOMMUNICATIONS POLICY
EXECUTIVE OFFICE OF THE PRESIDENT
WASHINGTON, D.C. 20504

JAN 23 1974

OFFICE OF CHIEF ENGINEER

January 24, 1974

ASSISTANT DIRECTOR

Mr. Raymond E. Spence, Jr.
Chief Engineer
Federal Communications Commission
Washington, D.C. 20554

Dear Ray:

This is in furtherance of our recent meeting with personnel from your Research Division and Mr. Kassens of the Broadcast Bureau in connection with FCC's technical analysis of the October 1973 OTP "Preliminary Analysis of VHF-TV Broadcast Assignment Criteria." This analysis was carried out with the assistance of a rather sophisticated computer program incorporating the FCC data base on presently assigned VHF stations.

During the course of our discussions it was agreed that you might utilize this computer program in conjunction with specific locations of proposed OTP "drop-ins" in the top 100 markets. Enclosure 1 provides a list of channel numbers and latitudes and longitudes of the proposed drop-in locations, indicated in the aforementioned report. The co-channel and adjacent channel separation distances to be applied to these stations for each of the three zones are indicated in columns A and B of the table below. Column A represents a straight 10% reduction and Column B adds another 5% and takes into account the possibility of using directional antennas.

Zone	SEPARATION CRITERIA (Miles)			Worst Case Adjacent Ch. 15%
	A (10%)	B (15%)	C (17.65%)	
I	153	145.5	140	51
II	171	161.5	156	51
III	198	187	181	51

Enclosure 2 lists channels and latitudes and longitudes of additional drop-in locations which might result from the use of precise frequency offset. The co-channel separation for these channels are indicated in Column C of the above table. A 15% adjacent channel separation was also used in this case.

It would be appreciated if you could use your computer program and associated data bases regarding the possibility of dropping in these channels at the indicated locations. For purposes of these calculations a Flexibility Factor of "0" miles should be assumed.

Sincerely,



W. Dean, Jr.
Assistant Director
for Frequency Management

Enclosures

CHANNEL	N. LATITUDE (Deg - Min)	W. LONGITUDE (Deg - Min)
12 SAN FRANCISCO	37-36	122-32
2 } DALLAS	32-42	96-58
9 }	33-17	96-50
3 SEATTLE	47-27	123-20
3 } MIAMI	25-23	80-35
9 }	25-39	80-50
13 }	25-20	80-25
5 HOUSTON	29-29	95-00
8 } KANSAS CITY	39-37	95-25
12 }	39-30	94-02
8 MILWAUKEE	43-08	88-27
11 DAYTON	39-29	83-40
4 PORTLAND, ORE	45-26	121-45
12 MEMPHIS	35-02	90-39
10 NASHVILLE	36-09	86-51
5 } JOHNSTOWN	40-56	78-28
12 }	40-32	78-00
3 } BIRMINGHAM	33-28	87-27
8 }	33-30	87-07
2 GREENVILLE	34-24	81-42
4 ALBANY	42-58	74-02
6 LOUISVILLE	37-54	85-58
4 ATLANTA	33-40	85-00
2 } CHARLESTOWN	38-30	81-13
11 }	38-40	82-00
10 SALT LAKE CITY	40-58	111-18

CHANNEL	N. LATITUDE (Deg - Min)	W. LONGITUDE (Deg - Min)
13 SALT LAKE CITY	40-37	112-13
10 SALINAS	35-59	121-28
5 WICHITA	37-58	97-26
11 SHREVEPORT	32-15	93-13
9 } LITTLE ROCK	34-44	92-15
13 }	34-35	92-47
8 MOBILE	30-27	86-43
8 GREEN BAY	44-34	87-50
11 DAVENPORT	41-07	90-23
8 KNOXVILLE	36-17	86-51
6 } SPRINGFIELD	39-30	89-13
13 }	40-00	89-33
3 PORTLAND, ME.	43-12	70-36
10 YOUNGSTOWN	32-40	89-38
9 } SPOKANE	47-36	117-51
13 }	47-47	117-30
8 COLUMBIA	35-54	81-09
2 } FRESNO	36-40	119-30
4 }		
7 }		
9 }		
13 }	36-34	119-12
4 } SOUTHBEND	41-32	85-53
12 }	41-25	86-00
4 DES MOINES	41-37	93-42
10 } PADUCAH	37-18	88-56
13 }	37-41	88-54
5 EVANSVILLE	38-30	87-24

CHANNEL

N. LATITUDE
(Deg - Min)

W. LONGITUDE
(Deg - Min)

12	EVANSVILLE	38-04	86-59
6	} SIOUX FALLS	43-35	96-13
7		43-34	96-33
4	} BINGHAMTON	42-26	75-52
7		41-52	76-12
8	} WILMINGTON	33-52	77-59
10		34-18	77-45
4	MONROE	32-16	91-58

CHANNEL		N. LATITUDE (Deg - Min)	W. LONGITUDE (Deg - Min)
4	A	41-08	87-38
12	B	41-13	82-28
8	C	40-23	79-27
7	D	38-17	89-58
10	E	47-42	123-30
3	F	40-20	85-48
11	G	43-01	85-22
10	H	37-39	85-50
2,4	I	32-36	116-15
12	J	40-42	111-12
2	K	30-00	98-23
5	L	36-54	76-10
7	M	34-01	112-07
6	N	38-16	97-32
2	Ø	32-23	93-11
6	P	34-55	92-52
8	Q	34-42	93-00
13	R	45-00	87-52
10	S	41-50	90-39
7	T	40-58	88-42
9	U	40-59	88-33
5	V	32-40	89-48
7	W	35-35	85-00
5	X	37-14	92-50
6	Y	41-43	76-28
10	Z	35-07	106-28

D



EXECUTIVE OFFICE
OF THE PRESIDENT

OFFICE OF TELECOMMUNICATIONS POLICY

**TECHNICAL ANALYSIS OF VHF
TELEVISION BROADCASTING
FREQUENCY ASSIGNMENT CRITERIA**

OCTOBER 1973

INTRODUCTION AND SUMMARY

Executive Order 11556 requires that OTP, among other things, "Develop in coordination with the FCC, a comprehensive long-range plan for improved management of all electromagnetic spectrum resources." Consistent therewith OTP is constantly striving to ensure that the radio frequency spectrum resource is used in the best national interest. For example, during the past three years, extensive measures have been taken to reduce the percentage of spectrum space between 10 kHz and 40 GHz which heretofore was allocated exclusively to the Federal Government. In this time frame this percentage has been reduced from 46% to 26%, i.e., over 9,000 Megahertz have been made available for sharing by the non-Government sector.

The challenges of the future in this area loom large in view of the foreseen telecommunication requirements of a nation increasingly on the move, the increased application of space technology, and pressing requirements in areas such as Highway Safety and Emergency Medical Services.

The OTP and the FCC have been conducting a cooperative review of the spectrum resource as a forerunner to determining how future requirements can best be accommodated spectrumwise. As a part of this evaluation, a preliminary analysis was undertaken by the OTP as to the technical suitability of existing VHF-TV assignment criteria.

Findings thus far are summarized as follows:

- o Existing separation criteria are conservative and there is sufficient evidence to indicate that, with the application of readily available technical measures, a substantial number of additional VHF television broadcasting stations could be inserted into the major 100 markets in the Continental United States, without affecting those already in being and operating in accordance with current FCC rules.
- o Techniques exist, the application of which, singly or in combination, would facilitate additional drop-ins:
 - Reduction of present distance separation criteria.
 - Use of directional antennas where necessary to overcome slight derogations of distance separation criteria.
 - Increased use of precise off-set frequency control.
 - Increased consideration of the advantages offered by terrain shielding.

- Possible simultaneous use of horizontal and vertical antenna polarization.
- o As a result of analysis of the possible application of one of the above technical techniques (relaxation of existing co-channel criteria by not more than 10%), it appears feasible to introduce as many as 30 additional VHF-TV stations within the top 100 markets. Relaxations of this magnitude already exist as regards certain current VHF-TV frequency assignments. Further, through the use of directional antenna patterns to reduce separation distance by another 5%, it should be possible to add at least another 32 VHF-TV stations within these markets, for a total of 62; the use of such patterns being consistent with present practice in certain instances.
- o In addition to the above technical possibilities, a review would seem in order of the existing FCC policy which assures TV broadcasting stations the ability to take advantage of maximum antenna heights and powers.
- o The current FCC Television Assignment Criteria should be reviewed and revised, taking into account the current state of the radio art, experience gained in the past 20 years, and technical compensations which can be applied readily to permit additional use of the valuable VHF television broadcasting spectrum allocations.

BACKGROUND

In April 1952, the FCC issued its Sixth Report on Television Allocations which established the basic structure for the development of VHF television use of the radio spectrum. This structure was predicated on the adoption of certain fixed separation distances between co-channel and adjacent channel operations.

Today, in the top 100 markets of the United States, virtually all VHF television allocations are on the air. Existing assignment criteria have already been derogated in numerous instances.

Examples of distance derogations in being are:

- o Albany, New York and Newark, New Jersey, both on channel 13, 142 miles separation (16.5% derogation).

- o Jackson, Mississippi and Mobile, Alabama, both on channel 3, 175 miles separation (20% derogation).
- o Minneapolis, Minnesota and Wausau, Wisconsin, both on channel 9, 169 miles separation (11.1% derogation).

Another example of derogation, wherein antenna beam shaping was employed, is the Providence (New Bedford), Rhode Island and Portland, Maine assignments on channel 6; approximately 155 miles separation as compared to present criteria which require 170 miles separation in Northeast United States.

It is noted that other radio services (land mobile, aeronautical mobile, etc.) have been forced to change their spectrum use criteria several times in the past 20 years. For example, the channeling in several mobile communications services has been reduced from 200 kHz to 100, 50, 25, and in some cases to 12.5 kHz--this to accommodate additional pressing requirements.

EXISTING TECHNICAL CRITERIA

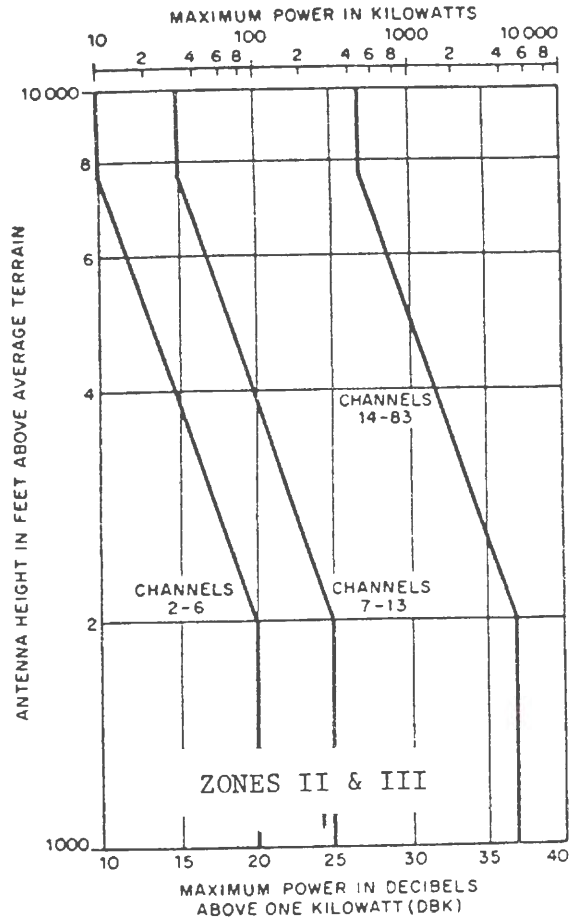
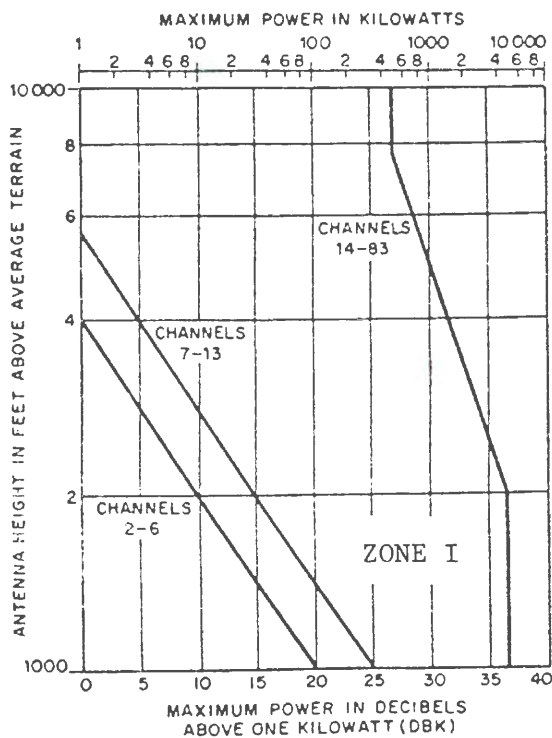
The preliminary analysis herein evaluates the technical feasibility of accommodating additional VHF television drop-ins in such a manner as to not adversely affect existing broadcasting stations operating in accordance with current FCC rules. The basic constraints applied currently to VHF-TV Broadcast stations are indicated in the tables and charts below. They pertain primarily to separation distances, permitted radiated power and antenna height.

A. Separation Distance

ZONE	CO-CHANNEL	ADJ. CHANNEL
I - N.E. U.S.	170 miles	60 miles
II - West U.S.	190 miles	60 miles
III - Southern U.S.	220 miles	60 miles

B. Power/Antenna Height

1. Minimum power is 100 watts effective visual radiated power. No minimum antenna height.
2. Maximum power: Except as limited by antenna heights in excess of 1000 ft. in Zone I and antenna heights in excess of 2000 ft. in Zones II and III, the maximum-visual effective radiated power above 1 kilowatt (dBK) is -- a) channels 2-6, 100 kilowatts, and b) channels 7-13, 316 kilowatts. The maximum power and antenna height combinations are shown in the charts which follow.



ANALYSIS

The chart in Attachment 1 lists vertically the top 100 TV markets in the United States; across the top is a list, by channel number, of the VHF allocations in the United States. It should be noted that channels 4 and 5, and 6 and 7 are not considered as adjacent channels since there is a frequency gap between them. A check has been placed under each channel currently assigned to a particular market. The checks with + and - next to them indicate that the assigned frequency has been offset either "+" or "-" 10 kHz to improve co-channel and adjacent channel sharing.

An "X" has been placed under the channel, and next to the market where the "drop-in" of an additional VHF channel could be accommodated. The determination as to where to place "X"s was made in the following fashion:

- (1) Choose one of the top 100 markets.
- (2) List existing stations.*
- (3) Select potential drop in.
- (4) Plot the transmitter coordinates of potential co-channel interfering stations.*
- (5) Assume a relaxation of existing co-channel criteria of no more than 10%, i.e., Zone I (153 mi.), Zone II (171 mi.), and Zone III (198 mi.).
- (6) In those instances where the 10% relaxation is not capable of uniform application, assume the use of directional antenna to further reduce separation criteria by not more than 5%, but only in the direction of the one station having the greatest interference potential. (This has the attendant effect of also reducing the associated adjacent channel separation requirements.)
- (7) Assume the location of drop-in transmitters to be generally consistent with the normal distance of existing VHF stations from the cities principally served.

Using this method, and as set forth in Attachment 1, sixty-^{two}~~seven~~ potential locations for "drop-ins" resulted in the top 100 markets, thirty of which did not envisage the use of directional patterns as described in (6) above. Local topographical and siting considerations may be used to increase the areas in which drop-ins can be located. Specific examples of applying the foregoing approach are contained in Attachment 2.

It is expected that the indicated drop-in stations could operate under the same power and antenna height constraints as existing VHF stations, and thus would have similar types of coverage. Some adjustment of low power, co-channel VHF TV translator frequency assignments might be necessary.

In the conduct of this analysis it was noted that additional possible "drop-ins" were precluded on the basis of current distance separation criteria, even though stations not at maximum power were involved.

* Based upon TV Fact Book,
1972-1973 Edition

The above presentation is but one example of how additional VHF drop-ins might be accommodated. It is foreseen that further channels could be added on the basis of more precise engineering involving the use of the following techniques or combinations thereof:

- o More extensive use of directional antennas.
- o Taking maximum advantage of terrain shielding.
- o Increased use of precise off-set frequency control.

In addition to the foregoing, the following areas warrant investigation:

- o Possible use of vertical in combination with present horizontal antenna polarization, a technique used extensively in European TV and elsewhere.
- o The possible use of sharing criteria based on interference-limited rather than noise-limited considerations.
- o The relief that would be afforded by revision of the existing FCC policy which assures TV broadcasting stations the ability to use maximum antenna height and power.

CONCLUSION

There is sufficient evidence to indicate that a substantial number of additional VHF television broadcasting stations could be inserted into the major 100 markets of the Continental United States, and elsewhere, without affecting those operating in accordance with current FCC rules. In short, the need exists to update the technical criteria currently applied in determining VHF television broadcasting frequency assignments.

RECOMMENDATION

That the current FCC Television Assignment Criteria be reviewed and revised so as to permit VHF TV broadcasting assignments to be made on a more rigorous engineering basis. This review should be undertaken in the light of the current state of the radio art, experience gained in the past 20 years in the application of existing criteria, and applicable techniques such as discussed herein.

ATTACHMENT 1

POTENTIAL VHF DROP-INS

IN TOP 100 MARKETS

MARKET	2	3	4	5	6	7	8	9	10	11	12	13
1. New York, N.Y.	✓		✓	✓+		✓		✓+		✓+		✓
2. Los Angeles, Cal.	✓		✓	✓		✓		✓		✓		✓
3. Chicago, Ill.	✓-			✓		✓		✓+		✓		
4. Philadelphia, Pa.		✓			✓-				✓			
5. Boston, Mass.	✓+		✓-	✓-		✓+						
6. Detroit, Mich.	✓+		✓			✓-		✓				
* 7. San Francisco/Oakland, Cal.	✓+		✓-	✓+		✓-		✓+			X	
8. Washington, D.C.			✓-	✓-		✓+		✓				
* 9. Cleveland, Ohio		✓		✓+			✓	(X)				
10. Pittsburgh, Pa.	✓-		✓+							✓		✓-
* 11. Dallas/Ft. Worth, Texas	X		✓+	✓+			✓	X		✓		✓+
12. Hartford/New Haven, Conn.		✓+					✓+					
13. Baltimore, Md.	✓+									✓-		✓-
14. St. Louis, Mo.	✓		✓-	✓-				✓		✓-		
* 15. Seattle/Tacoma, Wash.		X	✓	✓+		✓		✓		✓+		✓
16. Minneapolis/St. Paul, Minn.	✓-		✓	✓-				✓+		✓-		
17. Cincinnati, Ohio				✓-				✓			✓	
* 18. Miami, Fla.	✓	X	✓		✓	✓-		X	✓+			✓
* 19. Atlanta, Ga.	✓		X	✓-						✓+		
20. Providence, R.I.					✓+				✓+		✓+	
21. Indianapolis, Ind.			✓		✓		✓-					✓-
* 22. Houston, Tex.	✓-			X			✓			✓+		✓-
* 23. Kansas City, Mo.			✓	✓+			X	✓+			X	
24. Sacramento/Stockton, Cal.		✓			✓				✓			✓+
* 25. Milwaukee, Wisc.			✓-		✓		X		✓+		✓	(✓)

* INDICATES DROP-INS

MARKET	2	3	4	5	6	7	8	9	10	11	12	13
26. Columbus, Ohio			✓-		✓+				✓+			
27. Buffalo, N.Y.	✓		✓-			✓+						
*28. Dayton, Ohio	✓					✓+				X		
29. Tampa/St. Petersburg, Fla.		✓					✓-		✓-			✓-
*30. Portland, Oregon	✓		X		✓+		✓-		✓		✓	
31. Charlotte, N.C.		✓						✓+				
*32. Memphis, Tenn.		✓-		✓+					✓+		X	✓+
*33. Nashville, Tenn.	✓-		✓+	✓			✓+		X			
*34. Johnstown/Altoona, Pa.		X		X	✓				✓-		X	
*35. Birmingham, Ala.		X			✓-		X		✓-			✓-
*36. Greenville/Spartanburg, S.C.	X		✓-			✓+						
37. New Orleans, La.			✓+		✓+		✓				✓	
38. Harrisburg/Lancaster/ Lebanon, Pa.							✓-					
39. Denver/Boulder, Colo.	✓		✓-		✓-	✓		✓-			✓	
40. Toledo, Ohio										✓-		✓
41. High Point/Greensboro/ Winston-Salem, N.C.	✓-						✓-				✓	
42. Grand Rapids/Kalamazoo, Mich.		✓-					✓+					✓+
*43. Albany, Schenectady/ Troy, N.Y.			X		✓				✓-			✓
44. Wheeling, W.Va.- Steubenville, Ohio						✓		✓+				
45. Syracuse, N.Y.		✓-		✓-				✓-				
46. Flint, Mich.											✓-	
*47. Louisville, Ky.		✓-			X					✓+		
*48. Charleston/Huntington, W. Va.	X	✓+					✓+			X		✓+
49. Raleigh/Durham/ Chapel Hill, N.C.			✓	✓						✓+		
50. Lansing, Mich.					✓-				✓			

* INDICATES DROP-INS

MARKET	2	3	4	5	6	7	8	9	10	11	12	13
51. Oklahoma City, Okla.			✓-	✓				✓-				✓
52. San Diego, Cal.							✓		✓			
*53. Salt Lake City, Utah	✓-		✓-	✓+		✓-			X			X
54. San Antonio, Tex.			✓	✓				✓-			✓+	
55. Norfolk/Newport News/ Hampton/Portsmouth, Va.		✓+							✓+			✓
56. Orlando, Fla.					✓-			✓				
57. Phoenix, Ariz.		✓+		✓-			✓+		✓-		✓-	
58. Tulsa, Okla	✓+				✓		✓-			✓-		
59. Omaha, Neb.		✓			✓+	✓						
60. Wilkes-Barre/Scranton, Pa.												
*61. Salinas/Monterey, Calif.							✓+		X			
*62. Wichita, Kans.		✓-		X			✓		✓-		✓	
63. Richmond, Va.					✓+						✓-	
64. Rochester, N.Y.							✓		✓+			✓-
65. Manchester, N.H.								✓-				
*66. Shreveport, La.		✓-								X	✓	
67. Roanoke/Lynchburg, Va.						✓-			✓			✓
*68. Little Rock, Ark.	✓-		✓			✓-		X		✓+		X
*69. Mobile, Ala.-Pensacola, Fla.		✓-		✓+			X		✓+		(X)	
*70. Green Bay, Wisc.	✓+			✓+			X			✓+		
*71. Davenport, Iowa-Rock Island, Ill.			✓+		✓+		✓			X		
72. Jacksonville, Fla.			✓+			✓					✓-	
*73. Knoxville, Tenn.					✓		X		✓+			
*74. Champaign/Decatur/ Springfield, Ill.		✓+			X						✓	X
*75. Portsmouth, N.H-Portland, Me.		X			✓-							✓+

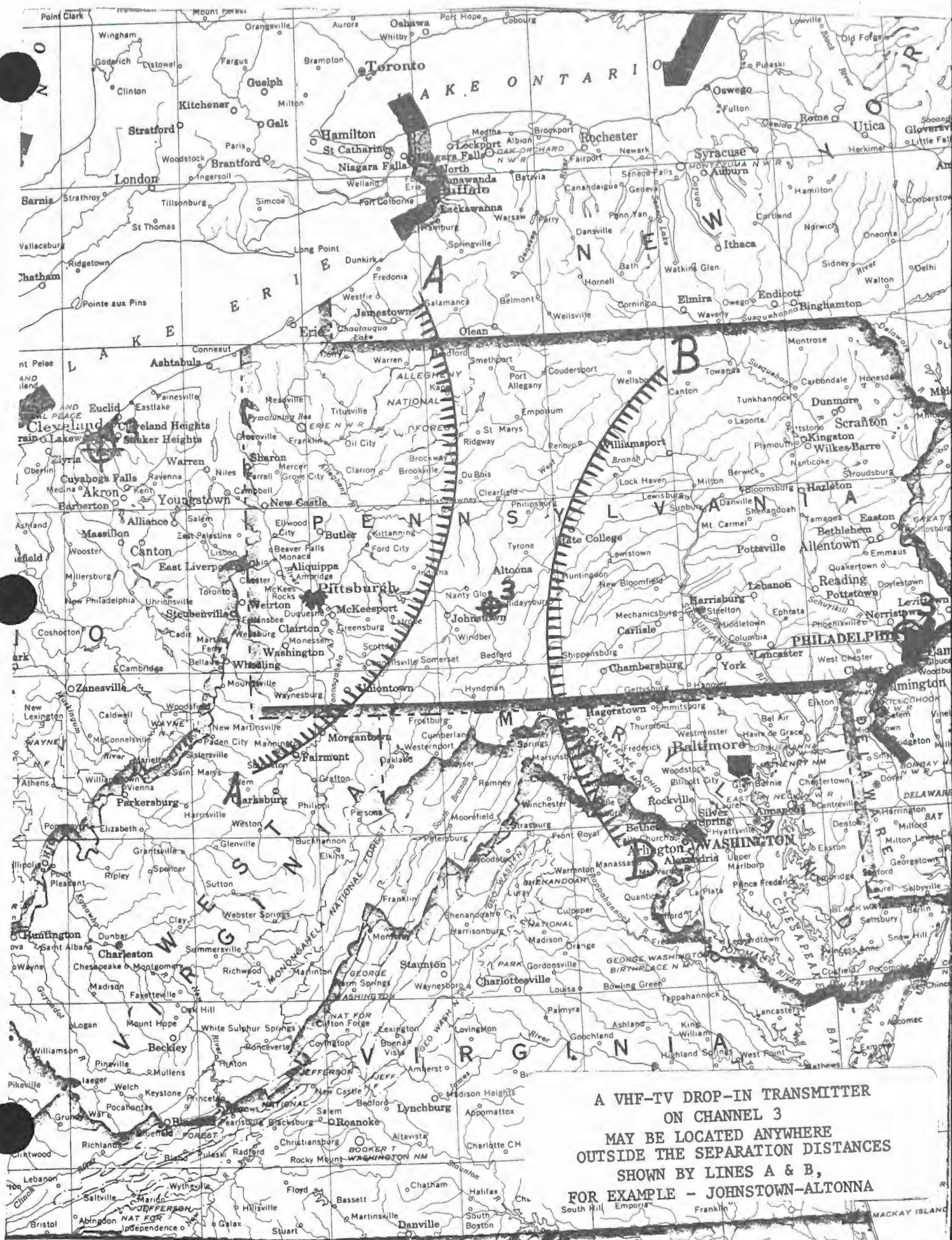
* INDICATES DROP-INS

MARKET	2	3	4	5	6	7	8	9	10	11	12	13
76. Cedar Rapids, Iowa	✓					✓+		✓-				
* 77. Jackson, Miss.		✓+							X		✓+	
* 78. Youngstown, Ohio									(X)			
* 79. Spokane, Wash.	✓-		✓-		✓-	✓		X				X
80. Columbus, Ga.		✓						✓+				
81. Greenville, N.C.								✓-				
* 82. Columbia, S.C.							X		✓-			
83. West Palm Beach, Fla.				✓							✓	
* 84. Fresno, Cal.	X		X			X		X				X
* 85. South Bend, Ind.			X								X	
86. Baton Rouge, La.	✓							✓-				
87. Des Moines, Iowa.			X				✓-			✓+		✓-
88. Chattanooga, Tenn.		✓+						✓			✓-	
89. Springfield, Mo.		✓+							✓			
* 90. Paducah, Ky.					✓+				X			X
* 91. Evansville, Ind.				X		✓		✓+			X	
* 92. Sioux Falls, S.D.					X	X				✓		✓+
93. Madison, Wisc.		✓										
* 94. Binghamton, N.Y.			X			X					✓-	
* 95. Wilmington, N.C.		✓-			✓		X		X			
96. Lincoln/Hastings/Kearney, Neb.				✓-					✓+		✓-	✓
97. Albuquerque, N.M.			✓+	✓+		✓+						✓+
98. Rockford, Ill.												✓
99. Augusta, Ga.					✓+						✓+	
* 100. Monroe, La.			X				✓+					✓

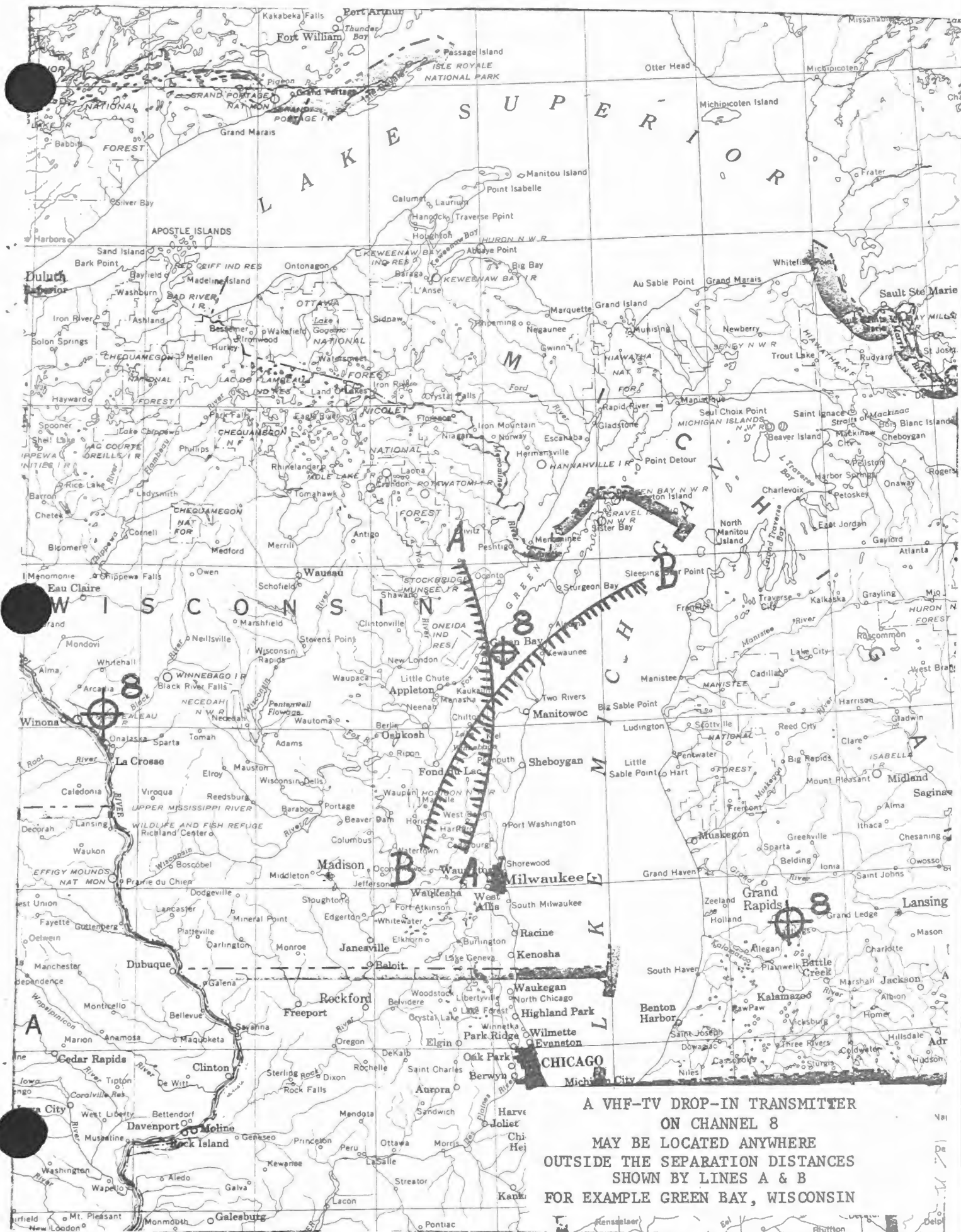
* INDICATES DROP-INS

ATTACHMENT 2

EXAMPLES OF SPECIFIC VHF-DROP INS



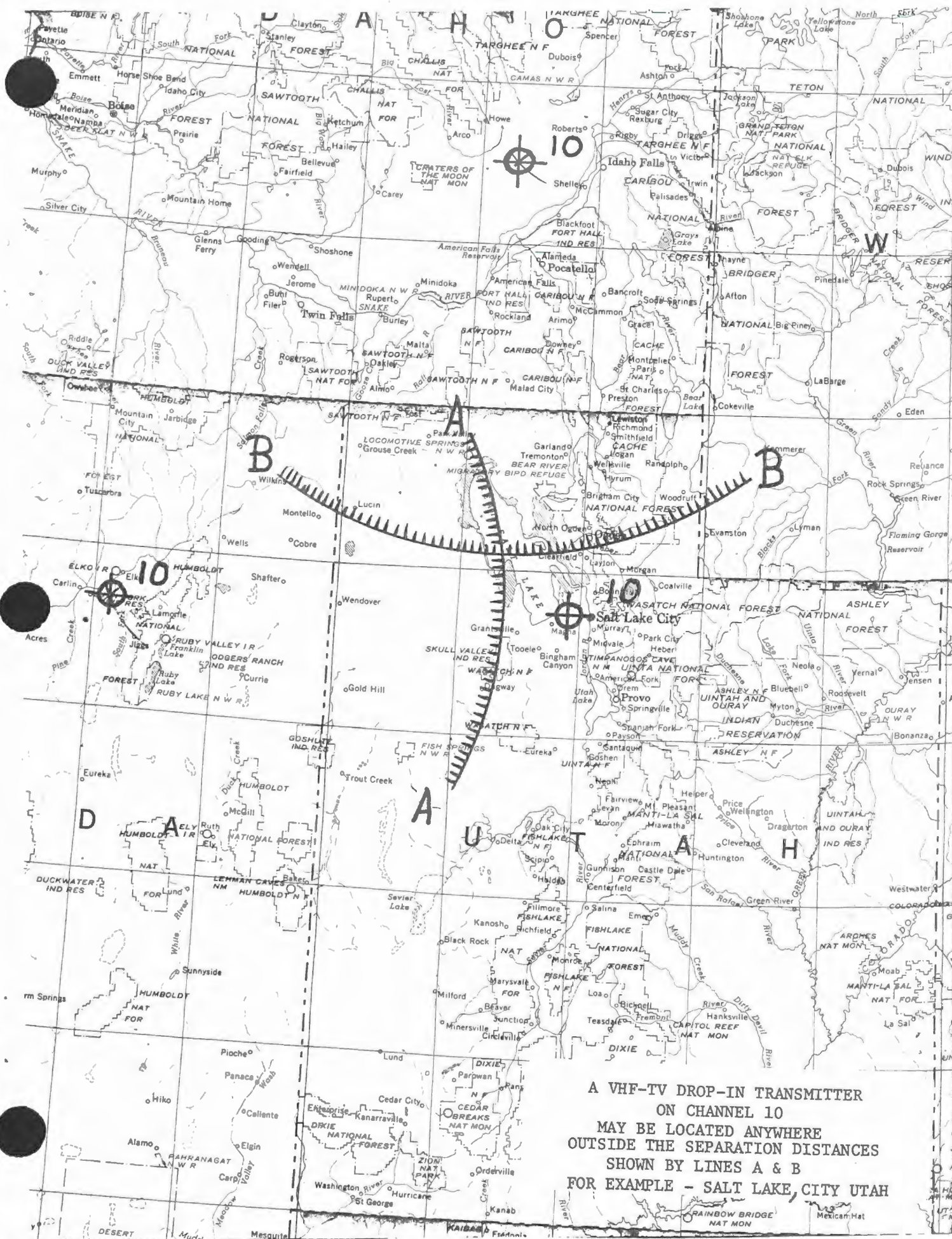
A VHF-TV DROP-IN TRANSMITTER
ON CHANNEL 3
MAY BE LOCATED ANYWHERE
OUTSIDE THE SEPARATION DISTANCES
SHOWN BY LINES A & B,
FOR EXAMPLE - JOHNSTOWN-ALTONNA



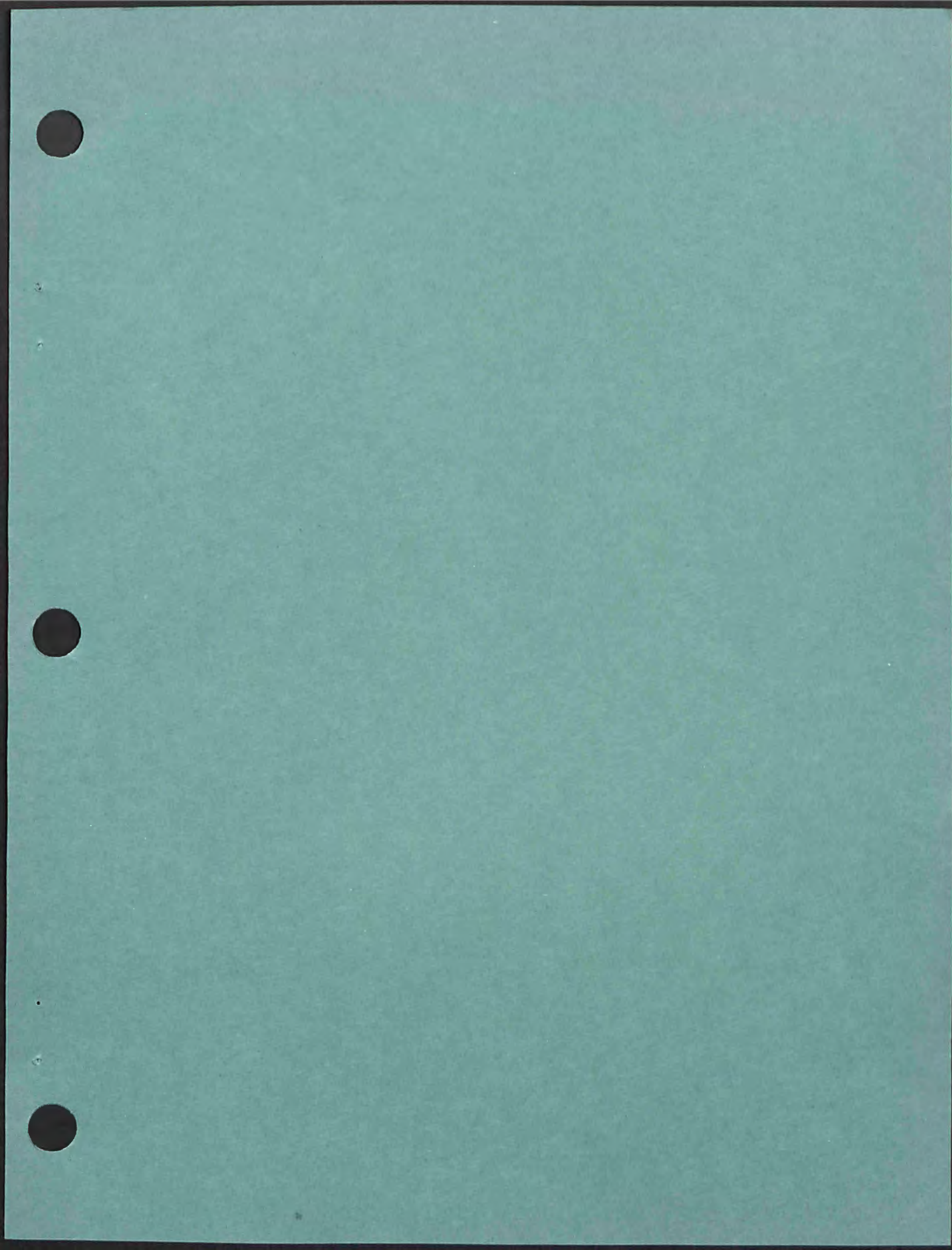
A VHF-TV DROP-IN TRANSMITTER
ON CHANNEL 8
MAY BE LOCATED ANYWHERE
OUTSIDE THE SEPARATION DISTANCES
SHOWN BY LINES A & B
FOR EXAMPLE GREEN BAY, WISCONSIN



A VHF-TV DROP-IN TRANSMITTER
ON CHANNEL 10
MAY BE LOCATED ANYWHERE
OUTSIDE THE SEPARATION DISTANCES
SHOWN BY LINES A, B, & C.
FOR EXAMPLE - NASHVILLE, TENNESSEE



A VHF-TV DROP-IN TRANSMITTER
ON CHANNEL 10
MAY BE LOCATED ANYWHERE
OUTSIDE THE SEPARATION DISTANCES
SHOWN BY LINES A & B
FOR EXAMPLE - SALT LAKE CITY UTAH



E

Open More TV Channels, White House Unit Urges

By Stephen M. Aug
Star-News Staff Writer

The White House Office of Telecommunications Policy issued a study today which says a substantial number of new television stations could be accommodated in some of the nation's largest cities—and it urged the Federal Communications Commission to reconsider its present restrictions on additional stations.

The study concerns VHF TV channels—2 through 13—and concludes that by using existing technology, at least 67 new stations could be put in cities within the 100 largest metropolitan areas.

The report did not list either the Washington or Baltimore areas as meeting the criteria which would allow them to have another VHF station. The Washington-area noncommercial station, WETA, is seeking FCC approval to switch from UHF channel 26 to VHF

channel 12—a move which apparently would not meet the technical criteria set forth in the new report.

The report has been the subject of much rumor in the broadcast industry, which is considered likely to oppose any plan that would increase the number of VHF television stations.

The industry would base its opposition on grounds of possible interference by one station's signal with another and loss of business that would result from the new competition.

THE report is in accordance with the views of Clay T. Whitehead, director of the White House Telecommunications office, who has long said there is a need for greater diversity of views in broadcasting.

The study suggests these techniques for increasing the number of stations:

Reducing by up to 10 percent the present require-

ments for specified distances between stations on the same channel (currently 170 miles in the Northeastern United States, for example).

Using directional antennas to beam signals away from nearby stations.

Increased use of so-called "offset frequency control" (moving the station's frequency slightly off the normal channel to avoid interfering with adjacent stations)

Use of natural shielding afforded by existing terrain to separate signals.

"THERE IS sufficient evidence to indicate that a substantial number of additional VHF television broadcasting stations could be inserted into the major 100 markets," the report says, "without affecting those operating in accordance with current FCC rules."

The basic plan by which VHF television stations are allocated to communities was formulated about 21 years ago, but since then technological developments may have made that allocation table somewhat dated, the report implies.

TV station allocations are determined by the FCC. In the early 1960s, having considered that channels 2-13 were filled, the FCC opened up the UHF—14-83 with the hope that they would allow a far greater number of stations.

But the VHF channels are still greatly preferred since they afford a broadcaster a much wider service area than do UHF channels.

A list attached to the OTP study says the largest metropolitan areas that could qualify for additional VHF stations under the criteria the agency considered are San Francisco, Cleveland, Dallas (two channels), Seattle, Miami, Houston, Kansas City and Milwaukee.

F

OTP

The More Channels the Better

By Gaylord Shaw

Associated Press

Clay T. Whitehead, the presidential adviser who rocked the broadcast industry last year by pushing for local control of network programs, now says television viewers should be given at least one additional channel to watch.

The director of President Nixon's Office of Telecommunications Policy said in an interview that policies should be loosened so new VHF TV stations—those broadcasting on channels 2 through 13—could be established in major markets.

He said this could lead to

the formation of one or more new national networks and would be "one way to get more diversity" into the programs beamed into America's homes.

Asked if Mr. Nixon shared his views, Whitehead replied "Generally, yes."

(An OTP spokesman said yesterday that Whitehead feels that channel 12 in the Washington area could serve as the public TV outlet here without interfering with local signals. WETA is presently on UHF Channel 26).

Whitehead denied he was launching a new administration attack on the networks. But his comments are cer-

tain to fan the controversy he started last December when he spoke of "ideological plugola" and bias in news broadcasts. He called then for more local control of national programming, especially news broadcasts.

At present, most major cities have three network affiliated stations and sometimes one or two independent or public TV stations broadcasting the VHF channels.

The Federal Communications Commission has refused to license new VHF stations and the TV industry generally supports this policy—which has been in force

since the early 1950s. But Whitehead contends it is too restrictive. He said he thinks 100 new stations should be added to the more than 600 now in operation "to give viewers that much more choice."

(The OTP spokesman said that Whitehead believes that "most of the 220 or so TV market areas in the country could probably add a station" with the notable exception of the already jammed Los Angeles market).

Whitehead acknowledged there is little chance that the FCC would change its policy, adding "the industry has beaten it down before."

Some of the new channels, he said, could be assigned to public TV, with others going to regular commercial operations... including black-owned stations.

In the interview, which coincided with his third anniversary as OTP chief, Whitehead repeated his view that there should be less government regulation of broadcasters.

"I think there should be a fourth, fifth or sixth network," he said. "I don't think God ordained that we should have only three networks."

G



NEWS:

From U. S. Sen. Howard H. Baker, (R-Tenn.)
Suite 2107, New Senate Office Building, Washington, D. C.
Telephone: 202-225-4944

FOR RELEASE: October 26, 1973

WASHINGTON---A report the Office of Telecommunications Policy has made available to U. S. Senator Howard Baker (R-Tenn) could result in far reaching changes in Tennessee television.

Senator Baker, the ranking Republican on the Senate Communications Subcommittee, said the report points out the feasibility of establishing new VHF television stations in Knoxville, Nashville and Memphis.

"I was most interested to learn of the technical possibilities of additional television frequency assignments," Baker said. "Acting on these recommendations can provide Tennesseans with greater diversity in television programming."

The OTP report lists 67 potential locations for new "drop in" stations and the channels which could be utilized. According to the study, Channel 8 might be used in Knoxville, channel 10 in Nashville, and channel 12 in Memphis.

Current Television broadcasting frequencies were assigned by the Federal Communications Commission in 1952. Although some areas have received additional or "drop in" stations since then, many such request have been denied by the FCC because of the existing technical standards.

Virtually all VHF television allocations are now on the air in the country's top 100 television markets. According to the report, however, there is sufficient evidence to indicate that, with the application of readily available technical measures, a substantial number of additional VHF television stations could be inserted into the major 100 markets in the Continental United States without affecting those already in being and operating in accordance with current FCC rules.

The study lists a number of techniques which could be used to establish additional drop-in stations. One method would be to reduce the present distance separation power requirements for stations in nearby regions operating on the same channel.

Another method would involve the use of directional antennas where they are necessary to overcome slight overlapping of signals. Other recommendations include increased use of precise off-set frequency control; increased consideration of the advantages offered by terrain shielding; and possible simultaneous use of horizontal and vertical antenna polarization.

The OTP study will now undergo further consideration by the government, the industry, and the public. Any changes in the VHF television allocations would be made by the FCC.

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F

News Release

G

A

SUMMARY CHRONOLOGY -- HOME WARNING POLICY

1. November 1971: Interagency Task Force, headed by OTP, completes review of policies and programs for use of telecommunications to provide weather and attack warning to public in their homes.
 - A. Conclusion: Acquisition and use of any warning receiver should be a voluntary decision by each purchaser.
 - B. Systems under consideration:
 - (1) Decision Information Distribution System (DIDS) - Defense Department
 - (2) Weather Radio System - NOAA
 - (3) NASA satellite system
 - (4) Tone signal capability in local TV and radio stations to be used as part of EBS.
2. January 13, 1975: OTP Policy Statement issued:
 - A. Reaffirms voluntary purchase
 - B. Signal system is best
 - C. NOAA Weather Radio selected because:
 - (1) Daily weather service tailored to local areas.
 - (2) Federal investment less.
 - (3) Inexpensive receivers already on market.
 - D. Warning Steering Committee, chaired by OTP will consolidate future efforts.

B²

OFFICE OF TELECOMMUNICATIONS POLICY
EXECUTIVE OFFICE OF THE PRESIDENT
WASHINGTON, D.C. 20501

January 13, 1975

NATIONAL POLICY FOR THE USE OF TELECOMMUNICATIONS
TO WARN THE GENERAL PUBLIC

Policy Statement

In November 1971, the Federal Government completed a review of national policies and programs for use of telecommunications to provide the American public with warning of an enemy attack or of natural disasters. It was established at that time, in a statement of national policy respecting home warning systems, that the acquisition and use of any warning receiver should be a voluntary decision by each citizen. Studies conducted since 1971 now have led the Government to update and reaffirm that policy.

It now has been established that in addition to the voluntary use of a warning receiver, the public interest would be served best by a single, Government operated system for warning citizens in their homes of enemy attack or natural disasters. In this regard, the National Oceanic and Atmospheric Administration (NOAA) Weather Radio will be the only Federally sponsored radio transmission of warning information to receivers optionally available to the general public.

The 1971 OTP policy statement committed the Federal Government to pursuing a program that would "establish a rapid, reliable warning capability, and ... bring the cost of a warning receiver within the reach of every American citizen." To this end, a series of tests and studies were initiated to explore several proposed home warning systems and market demands for home receivers. During 1974, the results of these studies were reviewed by the Warning Steering Committee, an interagency group chaired by the Office of Telecommunications Policy, and including representatives of NOAA, the Defense Civil

Preparedness Agency (DCPA), the Federal Communications Commission (FCC), the Office of Preparedness (OP), and the Department of Transportation (DOT).

The studies focused primarily on two alternative home warning systems. The first is the Decision Information Distribution System (DIDS) of the Department of Defense. Designed originally for enemy attack warning, its scope could be expanded to include warning citizens of natural disasters. The system is in the experimental stage. The second system is the National Weather Service's (NWS) VHF/FM Tone Alert System. (The NWS is an agency of NOAA.) This system already is operational for weather forecasting, and incorporates a special tone alert signal permitting receivers to be activated automatically if desired by the owner.

After analyzing these studies, OTP concluded that the NOAA system is the choice for priority expansion and will serve as the single national home warning system. The reasons for this are:

(1) It provides routine daily weather services, tailored to local areas, thereby enhancing the marketability of receivers;

(2) Federal investment required to complete coverage of most populated areas will be much less than the investment required to complete the DIDS transmitting system, and can be accomplished much sooner; and

(3) Inexpensive commercial receivers for this system are already on the market.

The development of alternative systems, if allowed to continue unchecked, could result not only in a needless proliferation of home warning systems but could also effectively split the market for receivers because of different technologies, which, in turn, might keep the cost of receivers so high as to be a serious obstacle to widespread voluntary purchase. Therefore, in order to avoid duplication, public confusion and unnecessary future financial

burden on the public (as consumers and taxpayers), the NOAA Weather Radio will be the only Federally sponsored radio transmission of warning information to receivers optionally available to the general public. Other systems such as the Decision Information Distribution System (DIDS) should no longer be considered candidates for this function.

The market demand studies for home receivers indicated that many citizens would voluntarily purchase receivers capable of receiving home warning (if one were available), but that the total number of households with such receivers would not -- for the foreseeable future -- constitute a majority of the population. Therefore, this policy recognizes that Government operated home warning systems, with purchase of the receiver on a voluntary basis, can only supplement other existing warning systems.

The Warning Steering Committee, chaired by the Office of Telecommunications Policy, will coordinate efforts for the use of telecommunications for warning dissemination to attain a consolidated national warning capability. In support of this effort, NOAA and DCPA will develop necessary plans to use the NOAA Weather Radio as a supplementary attack warning system, and will further develop plans and procedures to incorporate the civil defense siren systems into the consolidated warning system, as well as to maximize the provision of warning information to radio and television stations.

C

OFFICE OF TELECOMMUNICATIONS POLICY
EXECUTIVE OFFICE OF THE PRESIDENT
WASHINGTON, D.C. 20504

January 13, 1975

THE USE OF TELECOMMUNICATIONS TO WARN THE
GENERAL PUBLIC

A Background Paper

Federal, State and local government agencies share responsibilities to warn the public of the imminence of emergencies, such as nuclear attack, hurricanes, seismic sea waves, tornadoes, and other natural or man-made disasters. The principal existing means for warning the general public are sirens, news-type announcements by local radio and television stations, and block-by-block canvassing by public safety officials.

Existing warning systems are relatively slow, ineffective at night, and lacking in nationwide coverage. For many years, various Federal agencies have been studying ways to use radio techniques to overcome these deficiencies. From these studies, several proposed systems have emerged which differ in technical details, but which have one element in common -- the use of a home radio receiver which would be turned on by a

signal from the Federal Government in an emergency. Such a system could be activated in seconds, could be effective in waking people up at night, and could achieve wide coverage of populated areas.

As of 1971, four such radio systems were under active consideration: the Decision Information Distribution System (DIDS) of the Department of Defense; the Weather Radio System of the National Oceanic and Atmospheric Administration (NOAA); a satellite-based system under study by NASA, and the incorporation of a tone signalling capability in local radio and TV broadcast stations which would be utilized as part of the Emergency Broadcast System (EBS).

These and other possible concepts for such a system were reviewed by a Federal interagency task force in 1971. The principal focus of attention at that time was whether some form of legislation should be proposed which would assure that a warning receiver would be introduced into virtually every home. (This could be accomplished, for example, by requiring manufacturers to incorporate a radio warning receiver in every new

television set.) If such legislation were passed, it would be essential to select the warning system having the highest possible degree of reliability and national coverage, since the participation of the entire American population would be virtually assured. The DIDS system was considered at that time to be the best candidate to meet such a requirement.

After reviewing the policy implications of such legislation, however, it was decided that the government should not pursue a program which would so forcibly inject a government communications capability into every home. Therefore, in November, 1971, a policy was established that public participation in a Federal radio warning program should be by the voluntary purchase of a warning receiver.

Without widespread participation assured by legislative action, it became important to consider the willingness of the public to voluntarily buy warning receivers. Two factors were recognized which would affect the decision to buy: what services would the receiver offer, and how much would it cost? In addition,

it became necessary to reconsider the value of Federal investment in radio warning transmitters in light of the additional benefits which would be received from a system of limited penetration. As a practical matter, it was necessary to recognize that many people are warned in time of many emergencies by the existing warning systems. A radio system with the alerting feature (automatic turn-on) represents a certain degree of performance improvement, rather than an all-or-nothing capability.

Following the 1971 policy decision, OTP initiated studies of receiver cost and market penetration. As a result of these studies, we are now convinced that the NOAA Weather Radio is the best choice for a Federal radio warning system. The reasons for this are:

1. It provides routine daily weather services tailored to local areas, enhancing the marketability of receivers;

2. Federal investment required to complete

coverage of most populated areas will be much less than the investment required to complete the DIDS transmitting system, and can be accomplished much sooner; and

3. Inexpensive commercial receivers for this system are already on the market.

With respect to other candidates, we find (1) a satellite-based system is more expensive and not feasible in this decade, and (2) the use of private radio and television facilities to broadcast a "turn on" signal in a timely manner suffers from disadvantages in coverage and geographical selectivity. OTP has considered arguments that each agency should implement and promote its own system for broadcasting warning with alerting signals to the public. We believe that this would entail an unacceptable duplication of investments both by the government and by the using public. Only one system should be supported by the Federal Government for direct broadcasting to the public in this manner.

The civil defense community can take advantage of the additional capability inherent in the NOAA Weather Radio by making arrangements to use the system as an additional means of disseminating attack warning information to the general public.

During 1974, the Warning Steering Committee was convened to review the results of studies and the present situation. The Committee is chaired by OTP and includes representatives of the Defense Civil Preparedness Agency (DCPA), Department of Transportation, NOAA, the GSA Office of Preparedness, and the FCC. The Committee considered all facets of the problem, and all participants have advised OTP of their views on the matter. As a result, the national policy issued by OTP in 1971 has been updated to include the government's intention to support only one system for the transmission of warning information to receivers available to the public -- the NOAA Weather Radio. A copy of the updated policy is attached.

The Defense Civil Preparedness Agency has considered

the DIDS system as a means of performing warning functions other than the transmission of signals directly to the public. The cost-effectiveness of the DIDS system, relative to existing systems for these other functions, has not been evaluated by OTP. The Department of Defense will ultimately decide whether the construction of DIDS transmitters nationwide is warranted for such purposes, and when such construction might proceed. However, this system will no longer be considered as a means for broadcasting warning signals direct to the public by means of home warning receivers.

D

OFFICE OF TELECOMMUNICATIONS POLICY
EXECUTIVE OFFICE OF THE PRESIDENT
WASHINGTON, D.C. 20504

Release Date: January 13, 1975
Contact: John A. Loftus
(202) 395-4990

NEWS RELEASE

OTP PICKS NOAA SYSTEM FOR HOME WARNING

John M. Eger, Acting Director of the Office of Telecommunications Policy, today announced new developments in the national policy for using telecommunications to warn the public of an enemy attack or natural disasters. The new policy respecting home warning designates the National Weather Service VHF/FM forecasting and warning system (Weather Radio) as the sole Government operated radio system for communicating attack or disaster warnings directly to the general public in their homes. The National Weather Service is an agency of the National Oceanic and Atmospheric Administration (NOAA).

In November 1971, the Warning Steering Committee, an interagency group chaired by OTP, completed a review of national policies and programs for using telecommunications to warn the general public. It was established at that time that the acquisition and use of any home warning receiver should be a voluntary decision by each citizen.

The 1971 policy statement also committed the Federal Government to pursue a program that would "establish a rapid, reliable warning capability, and bring the cost of a warning receiver within the reach of every American citizen."

"Studies conducted since 1971 now have led OTP to update and reaffirm that policy," Mr. Eger said, adding that the public interest would be served best by a single Government operated system for warning citizens in their homes of enemy attack or natural disasters and that the NOAA Weather Radio System, already operational for weather warning, can be adjusted easily to include attack warning. The NOAA system incorporates a special tone alert signal permitting home radio receivers to be activated automatically if desired by the owner.

Therefore, Mr. Eger reaffirmed the need to protect the privacy and consumer interests of the public from undue Government intrusion, even for warning purposes. "Under no circumstances should the Government require or legislate a warning receiver in the private home," he said.

The new policy statement designating the NOAA Weather Radio as the sole Government operated radio system for communicating warning directly to the general public means that other systems under consideration or experimentation by the Federal Government "should no longer be considered candidates for this function," Mr. Eger said. "The development of alternative systems, if allowed to continue unchecked, could result not only in a needless proliferation of home warning systems, but could also effectively split the market and keep costs of home receivers so high as to be a serious obstacle to widespread voluntary purchase," Mr. Eger said.

Mr. Eger stressed that the use of the Weather Radio to broadcast warnings directly to the home is a supplementary measure designed to improve the coverage of existing warning systems. The primary system for transmitting warning of an enemy attack to State and local governments will continue to be the National Warning System (NAWAS).

NAWAS -- operated by the Defense Civil Preparedness Agency -- interconnects with 1200 local government warning points to notify local government officials that public attack warning should be sounded by siren systems and other locally-chosen means. Radio and television stations also are notified through the national newswire services that an attack warning has been issued.

Commenting on today's statement, Mr. Eger took particular note of Congressman Clarence J. (Bud) Brown's long standing interest in home warning, and expressed his gratitude to the Ohio Republican for his cooperation and assistance in support of a coordinated national policy. A separate statement reflecting Mr. Brown's own views on the subject was issued today from the Congressman's Capitol Hill office.

A background paper further explaining the home warning policy is attached to OTP's policy statement.

February 25, 1975

EMERGENCY BROADCAST SYSTEM (EBS)

Background Information

For some years, an arrangement has existed which permits the President to address the general public by radio in time of emergency. The facilities of the Nation's commercial broadcasters are available for this purpose on a voluntary, organized basis. The system, known as the Emergency Broadcast System, satisfies the basic White House requirements, is available for activation from standby status on a few minutes notice, and is tested for reliability in accordance with established procedures.

In February 1971, during a scheduled test of the EBS, an inadvertent transmission was made which resulted in confusion on the part of the public. Although immediate action was taken to correct the procedures and eliminate the possibility of another such failure, the Office of Telecommunications Policy took steps to examine the entire system for deficiencies. An interagency review group was formed, and as a result of extensive study certain changes were made to improve the Emergency Broadcast System.

The following paragraphs discuss the most important of these changes.

Remove Attack Warning Message from EBS Activation Procedure

Under 1971 procedures the notice to activate the EBS could be issued with or without an attack warning, depending on the situation at the time of activation. These arrangements led to the misconception that the EBS was primarily a warning system, and tended to cloud the fact that the primary purpose of the EBS is to provide a means for the President during periods of national emergency, to reassure and give direction to the populace regarding survival and recovery of the nation.

It is essential that both activation of the EBS and dissemination of attack warning be accomplished as quickly as possible. However, inherent delays are encountered and unnecessary numbers of personnel are involved in a combined activation of EBS and distribution of attack warning.

The EBS was never intended to be the Nation's primary warning system. That function is performed by the National Warning System (NAWAS) of the Defense Civil Preparedness Agency (DCPA), an agency in the Department of Defense.

Establish a Double-Check Verification of the Activation Message

The current EBS activation message contains an authentication word to indicate that it is authentic, but an examination of the actions taken during the incident in

February 1971 pointed to a need for additional confirmation. Accordingly, hot line telephones have been installed between the message origination point and control centers of Associated Press (AP) and United Press International (UPI) Wire Services. This capability provides verbal confirmation that EBS activation has been requested before AP and UPI transmit the notification of activation to hundreds of broadcast station subscribers to their Wire Services.

Provide Full-Scale Redundancy

Either one of two locations are able to relay the President's activation of the EBS. Both activation points are equipped with identical sets of telephone and teletype equipment to provide complete redundancy and flexibility in an emergency.

Revise Testing Procedures

New equipment and activation procedures required changed test methods and schedules. There are two major types of testing; weekly scheduled checks of the activation and termination systems and procedures and quarterly Closed Circuit Tests down to the individual broadcast stations. Neither of these tests involve on-the-air announcements.

* * *

The Office of Telecommunications Policy conducts planning reviews of the EBS and, supported by the FCC,

develops the EBS to assure that the system realizes its full potential. Simplified and clarified procedures were published effective March 15, 1974. Since that time there have been three Closed Circuit Tests -- July 3, 1974; November 1, 1974; and February 21, 1975. There was some equipment failure difficulty during the July test, but the last two tests were successful and show that the procedures that have been developed are workable. Testing will continue and procedures will be refined as minor corrections are identified.

A

SUMMARY CHRONOLOGY -- FUEL ALLOCATION FOR TELECOMMUNICATIONS

1. October 29, 1973: AT&T requests Department of Interior's Office of Oil and Gas to: (1) add category "Telecommunications" to the list of priority customers for propane allocation; and (2) rule that Bell System usage categories are "priority customers."
2. December 20, 1973: AT&T comments on Federal Energy Office's Fuel Allocation Regulations on Propane and Butane of December 13, 1973. Requests that rules be amended to include telecommunications as emergency services.
3. January 30, 1974: AT&T and USITA comment on Gasoline Rationing Contingency Planning of January 14, 1974, recommend it comply with Mandatory Fuel Allocation Rules.
4. April 8, 1974: FCC and AT&T comments to FEO, object to restrictive language that would entitle carriers to higher allocation level and only during period of "substantial disruption of normal service."
5. July 1, 1974: OTP letter to FEO similar to FCC and AT&T comments, recommends rules be modified to reflect "essential nature and priority needs" of telecommunication services to public and government sectors.

B

J. H. Hunt
Assistant Vice President



American Telephone &
Telegraph Company
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New York, N. Y. 10007
Phone (212) 303-3405

October 29, 1973

Mr. John J. Smithson
Director - Propane Division
Office of Oil and Gas
Department of Interior
17th & F Streets, N.W.
Washington, D. C. 20036

Dear Mr. Smithson:

The purpose of this letter is to further emphasize the critical nature of the Bell System's need for propane and raw materials manufactured from propane which Mr. Williams of our Washington Office discussed with you during a meeting in your office on October 11, 1973.

We have reviewed the Mandatory Propane Allocation Program published on October 2, 1973 and are concerned that the "Priority Customer" category does not assure that the operating, manufacturing and supply units of the Bell System will continue to receive the supply of propane or raw materials derived from propane necessary to perform certain operations which are vital to the provision of telecommunications services to the entire nation.

As outlined in our comments submitted to the Office of Oil and Gas on September 6, 1973, and as supplemented by my letter to Mr. D'Andrea of September 13, 1973, the Bell System is comprised of The American Telephone and Telegraph Company, 23 Operating Telephone Companies, and Western Electric Company, Bell Telephone Laboratories, and subsidiaries. The Bell System provides service to approximately 117 million telephones. These telephones and other telecommunications services serve local, state and the United States governments as well as commercial, industrial and private customers. In providing telecommunications service, the Bell System employs over 1 million people and utilizes approximately 28,000 buildings and 162,000 motor vehicles.

The Mandatory Propane Allocation Program defines ten categories of end-users as "Priority Customers." A review of the ten priorities shows that each and every one of these categories of customers depends for its very existence on reliable telecommunications. For example, category 7 covers essential government services such as

fire and police protection. Clearly, the security and welfare of the public depends on reliable telecommunications. Emergency service such as 911 or other telephone oriented emergency service would be literally impossible without reliable telecommunications. The effectiveness of medical services provided by hospitals, ambulances and first aid units would be severely limited by a reduction or deterioration in telecommunications services.

Telecommunications services to both the Department of Defense and to the various Federal Agencies are vital to national security and to the safety and welfare of the nation. That service cannot be allowed to deteriorate.

In addition, both industry and the general public are highly dependent upon telecommunications services. For example, the airline industry relies on vast telecommunications networks to coordinate its flight operations and the failure to maintain these networks would have a disastrous effect on that industry.

Because of the dependence of the public on telecommunications services, the law has placed an obligation on the Bell System as a public utility to not only render reasonably adequate service to all who apply, but also to observe more than ordinary care in the rendition of that service.

Telecommunications services, unlike many public utility and non-regulated industry commodities, cannot be placed in storage. Inventories cannot be stockpiled during low periods of demand and held in reserve for peak periods. Our services must be available on demand 24 hours a day, 7 days a week to anyone who wants to use them, and the user need not even be a Bell System customer. The interrelation of the Bell System communications network's reliability and the daily activities of government, industry and the general public requires that adequate supplies of energy be made available for these essential services.

The Bell System used approximately 4.8 million gallons of liquid propane in 1972. In light of the forecasted shortage of propane, we have instituted a system-wide conservation program. Even though we expect this program to result in some reduction in propane consumption, we estimate that due to growth our overall 1973-1974 requirements will be somewhat larger than the amount used in 1972-1973. The major critical uses of propane in the Bell System are set forth below:

1. Liquid propane is used in the operation of environmental equipment for construction and maintenance forces working in manholes and cable vaults. Approximately 90% of the equipment, such as blowers, pumps, generators, heaters, etc. are powered by liquid propane. In addition, many of the Bell System's tools are powered by liquid propane, especially those used in cable splicing operations. The Bell System used approximately 3.8 million gallons of bottled liquid propane in 1972 in operating these various

types of equipments and tools. Without this equipment and tools operational, construction and maintenance forces would be unable to enter manholes or cable vaults. Even those locations that are not flooded, and therefore require no pumping, could not be worked in because the lack of ventilation would endanger the lives of our workers and violate both Bell System Safety Standards and United States Department of Labor Occupational, Safety and Health Administration Standards (OSHA). These same safety standards do not permit open flames in environments such as manholes. In these operations we must use solder pots and other liquid propane powered tools to accomplish the work and comply with local, state and federal regulations.

A shortage of liquid propane would prevent us not only from adding new plant, but also from maintaining the existing outside plant network which provides service to the entire nation.

2. Liquid propane is used to heat our smaller switching offices, radio relay buildings and some microwave transmission buildings. Most of these buildings are located in small communities and many are in remote locations. While many of these are not manned on a full-time basis, temperatures must be controlled for reliable equipment operation. We have reviewed the heat requirements for these types of buildings and have instructed our field forces to reduce thermostat settings to conserve fuel consistent with optimum equipment operation. The Bell System used approximately 115,000 gallons of bottled liquid propane in 1972 to heat 200 buildings and approximately 932,000 gallons of bulk liquid propane to heat 700 buildings (19 buildings use 15,000 or more gallons per year).

3. Propane is the basic feed stock in the manufacture of polyvinylchloride (PVC). PVC is vital for the continued operation of the telecommunications network. For, it is used in large quantities - estimated 110,000,000 lbs. in 1974 - in insulating telecommunications wire and cable so essential to the maintenance of telephone service.

*Good with
1 lb per wire*

From October 2, 1973, the date on which the Mandatory Propane Allocation Program took effect, the PVC supply situation has deteriorated to the point where Western Electric has now had to reduce its already curtailed programs for the production of PVC insulated wire by 12% per month beginning November 1, 1973. And, according to current projections, further drastic reductions in production may have to be made after

January, 1974. The problem of short supply also extends to other basic plastics used in wire and cable manufacture such as high and low density polyethylene.

Moreover, a severe shortage of PVC and of other plastics will affect nine major Western Electric manufacturing plants which employ approximately 35,000 people.

A shortage of liquid propane or of raw materials derived from propane in any of the foregoing categories could adversely affect our ability to meet the critical telecommunication needs of the nation. We simply cannot allow service to industry, Local State and Federal Government and the public to deteriorate.

We respectfully request the the Office of Oil and Gas: (1) add a category "telecommunications" to the list of "Priority Customers" contained in Section 2(c) of the Mandatory Propane Allocation Program; or, (2) provide a ruling which will clearly place the various Bell System usage categories under existing "Priority Customer."

We urgently request that action be taken by your office in order to allow the Bell System to obtain adequate supplies of propane and raw materials derived from propane to meet our vital service obligation.

You can be assured that we will continue a vigorous program throughout the Bell System to seek alternates for the use of propane and PVC and to conserve the use of propane.

If we in the Bell System can be of assistance or provide you any additional information, please contact Mr. Henry M. Williams in our Washington Office (telephone 466-5563) or Mr. Donald J. Sowder in our New York Office (telephone 212-393-3176).

Yours very truly,

Original signed by J. H. Hunt

Assistant Vice President

Hubert L. Kertz
Vice President



American Telephone and
Telegraph Company
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New York, N.Y. 10007
Phone (212) 393-1000

December 20, 1973

Mr. William E. Simon, Administrator
Box 12
Federal Energy Office
1016 16th Street, N.W.
Washington, D. C. 20036

Dear Mr. Simon:

The following comments are submitted as the Bell System's response to the Federal Energy Office's Proposed Mandatory Fuel Allocation Regulations, Subpart D - Propane and Butane as published in the Federal Register, Volume 38, Number 239, Part III, dated December 13, 1973.

The Bell System is comprised of The American Telephone and Telegraph Company, 23 Operating Telephone Companies, Western Electric Company and its subsidiaries, and Bell Telephone Laboratories. The Bell System provides telecommunications services to approximately 114 million telephones. These telephones, and other telecommunications services, serve commercial, industrial and private customers, as well as local, state and the United States Governments. The Bell System employs over one million people and uses approximately 28,000 buildings and over 168,000 motor vehicles. Our Country is dependent upon the Bell System, as an investor owned utility, for furnishing vital telecommunication services.

The Federal Energy Office, in establishing fuel allocation regulations, listed a number of priority activities. All relate to the health, safety and welfare of the public. Reliable telecommunications services are extremely important to activities such as health and medical services, police and other emergency services and government activities. Police, fire and other emergency agencies depend heavily on communications for the safety and welfare of the public. Emergency service such as 911 would be literally impossible without reliable telecommunications service. The effectiveness of medical services such as hospitals, ambulances and first aid units would be severely limited by a reduction in telecommunications services. In fact, telecommunications service is commonly included as a basic necessity in today's society. An example of the critical nature of telecommunications can be seen following a natural disaster. The T.E.C. Company is among the first units

to appear in order to restore communications because the overall restoration, as well as the health, safety and welfare of the public, is dependent on the reestablishment of reliable telecommunications services.

We are pleased to note that the vital role which telecommunication plays has been recognized throughout the regulations. There is a major recommendation we have that when adopted will significantly strengthen our ability to continue our telecommunication services.

The following recommended change is submitted for consideration:

Subpart D - 200.35 Allocation

"(f) Emergency Services, sanitation and telecommunication.
100 percent of base period. "

Recommendation - delete "telecommunication" from this paragraph and add paragraph "(n) Telecommunications.
100 percent of current requirements. "

Our reasoning for this request is the vital service telecommunications contributes to the health, safety and welfare of our Country. The Bell System used approximately 4.8 million gallons of liquid propane in 1972. In light of the forecasted shortage of propane, we have instituted a System-wide conservation program. Even though we expect this program to result in some reduction in propane consumption, we estimate that due to growth our overall 1973-1974 requirements will be somewhat larger than the amount used in 1972-1973. The major critical uses of propane in the Bell System are set forth below:

1. Liquid propane is used in the operation of environmental equipment for construction and maintenance forces working in manholes and cable vaults. Approximately 90% of the equipment, such as blowers, pumps, generators, heaters, etc., are powered by liquid propane. In addition, many of the Bell System's tools are powered by liquid propane, especially those used in cable splicing operations. The Bell System used approximately 3.8 million gallons of bottled liquid propane in 1972 in operating these various types of equipments and tools. Without this equipment and tools operational, construction and maintenance forces would be unable to enter manholes or cable vaults. Even those locations that are not flooded, and therefore require no pumping, could not be worked in because the lack of ventilation would endanger the lives of our workers and violate both Bell System Safety Standards and United States

Department of Labor Occupational, Safety and Health Administration Standards (OSHA). These same safety standards do not permit open flames in environments such as manholes. In these operations we must use solder pots and other liquid propane powered tools to accomplish the work and comply with local, state and federal regulations.

A shortage of liquid propane would prevent us not only from adding new plant, but also from maintaining the existing outside plant network which provides service to the entire nation.

2. Liquid propane is used to heat our smaller switching offices, radio relay buildings and some microwave transmission buildings. Most of these buildings are located in small communities and many are in remote locations. While many of these are not manned on a full-time basis, temperatures must be controlled for reliable equipment operation. We have reviewed the heat requirements for these types of buildings and have instructed our field forces to reduce thermostat settings to conserve fuel consistent with optimum equipment operation. The Bell System used approximately 115,000 gallons of bottled liquid propane in 1972 to heat 200 buildings and approximately 932,000 gallons of bulk liquid propane to heat 700 buildings (19 buildings use 15,000 or more gallons per year).
3. Propane is the basic feed stock in the manufacture of polyvinyl-chloride (PVC). PVC is vital for the continued operation of the telecommunications network. It is fire resistant and is used in large quantities - estimated 110,000,000 lbs. in 1974 - in insulating telecommunications wire and cable so essential to the maintenance of telephone service.

From October 2, 1973, the date on which the Mandatory Propane Allocation Program (EPO Regulation 3) took effect, the PVC Supply situation has deteriorated to the point where Western Electric has now had to reduce its already curtailed programs for the production of PVC insulated wire by 12% per month beginning November 1, 1973. And, according to current projections,

further drastic reductions in production may have to be made after January, 1974. The problem of short supply also extends to other basic plastics used in wire and cable manufacture such as high and low density polyethylene. Moreover, a severe shortage of PVC and of other plastics will affect nine major Western Electric manufacturing plants which employ approximately 35,000 people.

A shortage of liquid propane or of raw materials derived from propane in any of the foregoing categories could adversely affect the ability of the Bell System to meet the ongoing critical telecommunication needs of the Nation. We simply cannot allow service to industry, Local, State and Federal Governments and the public to deteriorate.

Please give our request your utmost consideration for inclusion in the Federal Energy Offices Regulation for our concern is that our capability for furnishing telecommunication service to our country not be impaired or jeopardized. I trust that these comments demonstrate the importance of telecommunication service to the Nation. I can assure you that the Bell System will continue to carry out a conscientious program to conserve energy.

If we in the Bell System can be of any further assistance please contact Mr. Henry M. Williams in our Washington Office (telephone 466-5563) or Mr. Michael Del Grande in our New York Office (telephone 212-393-3691).

Sincerely,

A handwritten signature in cursive script, appearing to read "H. L. Kertz".

H. L. Kertz

January 30, 1974

Mr. William E. Simon
Administrator
Federal Energy Office
1016 Sixteenth Street, Northwest
Washington, D. C. 20036

Dear Mr. Simon:

The United States Independent Telephone Association (USITA) is the national trade association of the Independent (non-Bell) segment of the telephone industry in the United States. The Independent telephone industry consists of 1,760 operating telephone companies serving over 23 million telephones through 11,090 exchanges in over one-half of the served geographical area of the nation. These companies, together with the operating companies of the Bell System, provide exchange and inter-exchange telecommunications services through the integrated facilities of the telephone network.

We are responding to your invitation to comment on the Gasoline Rationing Contingency Plan contained in your Notice of Inquiry issued January 14, 1974, as published in the Federal Register, January 16, 1974.

While the regulations as proposed apparently have been designed for simplicity of administration, they fail to accomplish or comply with the intent of Public Law 93-159.

In the third paragraph of the Notice of Inquiry, it is stated: "The goals of this contingency program are consistent with those set forth in the Mandatory Fuel Allocation Regulations."

This statement is not correct as the proposed plan for gasoline rationing is not consistent with the Mandatory Fuel Allocation Regulations nor in compliance with Public Law 93-159 for the following reason:

In the last paragraph of the background section it is stated:

"Unlike the allocation program, the rationing program would not define a class of priority users."

And, in fact, the proposed plan does not provide for the needs of priority users as required in Public Law 93-159 which to our industry is a most serious inconsistency.

Public Law 93-159 states:

Section 4(b)(1) "The regulation under subsection (a), to the extent practicable, shall provide for --

(B) Maintenance of all public services (including facilities and services provided by municipally, cooperatively, or investor owned utilities or by any state or local government or authority, and including transportation facilities and services which serve the public at large);" [underlining added]

Section 4(c)(3) "The President shall, by order, require such adjustments in the allocations of crude oil, residual fuel oil, and refined petroleum products established under the regulation under subsection (a) as may reasonably be necessary (A) to accomplish the objectives of subsection (b), or (B) to prevent any person from taking any action which would be inconsistent with such objectives." [underlining added]

The intent of Congress in writing these sections is clearly spelled out on page 12 of Conference Report No. 93-628 dated November 10, 1973, accompanying S.1570. It states in part as follows:

"In meeting the objectives of section 4(b), the President may find it most convenient to rely on historical use and supply patterns. The conferees wish to emphasize, however, that the President need not base allocations on a historical period. The President is intended to have full flexibility in devising the most effective and efficient means of meeting the priority needs of the American people identified in section 4(b). There are, of course, many situations where priority users simply do not have a historical use pattern. For example, in this emergency period a high priority has been assigned to the maintenance of public services including those provided by government and utilities -- whether privately, publicly, municipally, or cooperatively owned. It is expected that the President will pay special attention to the need of continuing these services without disruption or interruption. Allocations to utilities, in particular, should be made to the extent necessary to preserve the reliability of our utility services." [continuous underlining added]

You will note the next to the last sentence in which it is said: "It is expected that the President will pay special attention to the need of continuing these services without disruption or interruption."

As we understand the proposed gasoline rationing plan, all "commercial users" are thrown together in one group with no recognition given to priority users as defined in Public Law 93-159. While various statistics have yet to be gathered by the Federal Energy Office and an average allocation for each commercial vehicle determined by various proposed formulas, based on 1972 consumption, it would appear that the maximum allocation available for each commercial user would be substantially less than the amount needed by Independent telephone companies for their operations in 1974.

Further, "commercial vehicles" are defined as "vehicles owned either by private individuals or by businesses and are used for business purposes for at least 70% of the mileage driven." [underlining added]

It is inconceivable that the regulations would include vehicles used for telecommunications services and the other priority users such as emergency, sanitation and transportation services in the same allocation category with general commercial users, which, according to your own definition, could be used at least 30% for personal use.

As we stated to you in our comments, dated January 25, 1974, on the mandatory allocation program, the Independent telephone industry grew 11.5 per cent in 1972 and 11.0 per cent in 1973. A cutback of this magnitude in telephone service -- 22.5 per cent -- would be disastrous. This does not recognize, either, the extra burden that is being created for the telecommunications network by the government's policy of encouraging telephone use in order to curtail travel.

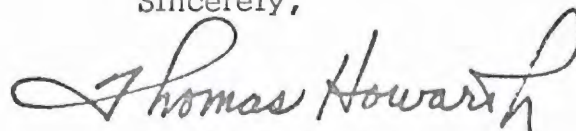
A majority of the 1,760 Independent operating telephone companies purchase their motor gasoline from retail gasoline stations. This is due to the fact that (1) the majority of the Independents are small operations, and (2) some of the larger companies have followed this practice in order to foster good community relations.

The Independent telephone companies operate in 48 states and must by federal and state regulations maintain service 24 hours a day, seven days a week, and are a vital necessity to defense of this country and to the general and economic welfare of every citizen and business enterprise.

We are relieved that in your Notice of Inquiry you state that this is only a proposed plan and that the notice is not intended as a proposed regulation but rather as a vehicle for further comment and discussion.

We sincerely urge that in your deliberations on any proposed regulations you consider our comments and the intentions and objectives of the Congress as legislated in Public Law 93-159.

Sincerely,

A handwritten signature in cursive script that reads "Thomas Howarth". The signature is fluid and elegant, with a large initial 'T' and a stylized 'H'.

THOMAS HOWARTH

Director of Government Relations

Hubert L. Kertiz
Vice President



American Telephone and
Telegraph Company
195 Broadway
New York, N.Y. 10007
Phone (212) 393-1000

January 30, 1974

William E. Simon, Administrator
Box GR
Federal Energy Office
1016 16th St., NW
Washington, D.C. 20036

Dear Mr. Simon:

This is the Bell System's response to the invitation to submit comments concerning the "Notice of Inquiry, Gasoline Rationing Contingency Plan" as published by the FEO in the January 16, 1974 issue of the Federal Register, Volume 39, Number 11, Part II.

The Bell System is comprised of The American Telephone And Telegraph Company, 23 Operating Telephone Companies, Western Electric Company and its subsidiaries and Bell Telephone Laboratories. The Bell System provides service to approximately 114 million telephones. These telephones, and other telecommunications services, serve commercial, industrial and private customers, as well as local, state and the United States Government. In providing telecommunications service, the Bell System employs over one million people and utilizes approximately 28,000 buildings and 168,000 motor vehicles.

Reliable telecommunications service plays a vital role in such areas as national defense, and health, safety and welfare of the general public. In addition, telecommunications is vital to the operations of all segments of industry. In fact, we are finding that the energy crisis is causing an increased dependence on telecommunications as a replacement for travel. For example, the District of Columbia Police Department announced that they were using the telephone to investigate minor complaints rather than dispatching patrol cars to conduct the investigation.

Telecommunications services, unlike many public utility and non-regulated industry commodities, cannot be placed in storage. Inventories cannot be stockpiled during low periods of demand and held in reserve for peak periods. Our services must be available on demand 24 hours a day, 7 days a week to anyone who wants to use them, and the user need not even be a Bell System customer.

The interrelation of the Bell System communications network's reliability and the daily activities of government, industry and the general public requires that adequate supplies of energy be made available for these essential services.

The vital contribution our industry makes to the Nation has been recognized in the January 14, 1974 Revision to Chapter II of Title 10 of the Code of Federal Regulations - Petroleum Allocation Regulations, wherein Telecommunications Services was allocated 100% of current requirements for bulk purchases of gasoline. We must receive the same assurance for the approximately 80 million gallons of gasoline we purchase annually, 45% of total, through retail outlets - gas stations. Since gas station purchases were not provided for in the Allocation Regulations, but bulk purchases were, we are reviewing the practicality of converting to bulk purchases. These conversions could be made in those areas of our operation where it is economically and geographically feasible and where such a conversion would result in energy conservation. The magnitude of such a conversion will understandably be a somewhat long range plan and even these steps will not eliminate the critical need to continue to purchase gasoline from gas stations. We are deeply concerned about these gas station purchases for they are jeopardizing our ability to provide reliable telecommunications services.

For a number of weeks now, as a result of gas station purchases, we have been experiencing great inefficiencies of operation whereby our vehicles must wait in line for long periods of time to purchase a limited amount of gasoline. This method of operation is causing us to incur severe penalties of lost productive hours, wasted gasoline while awaiting service, and the necessity to make multi-stops to receive adequate supplies of gasoline. These vehicles are essential to us in continuing to provide reliable telecommunications services to the Nation.

It is with these operational difficulties in mind and the threat they represent to our ability to provide reliable Telecommunication Services, that we offer the following recommendation applicable to not only the Telecommunications industry but also to all commercial users of gasoline that are allocated 100% of current requirements. This recommendation is offered in lieu of the commercial users coupon rationing plan as outlined in the "Notice of Inquiry".

All of the commercial users allocated 100% of current requirements through bulk purchases by the Petroleum Allocation Regulations, upon application to the proper authority, should be entitled to receive 100% of current requirements in equivalent coupons. This would be entirely consistent with the Petroleum Allocation Regulations. The Gasoline Rationing Contingency Plan is not consistent with these Regulations for the Plan does not list priority uses.

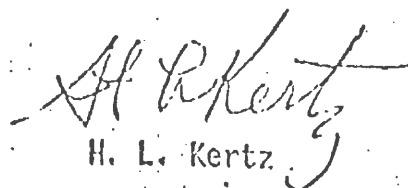
In the event gasoline rationing comes about, you may want to consider simpler and more economic methods of administering the plan for users that are to receive 100% of current requirements. For example, it may be found more advantageous to rely on identification of such vehicles as police cars, fire trucks, telephone construction vans, etc., at the gasoline station, rather than rely on coupons. We would be happy to participate in such an evaluation.

Further, let me assure you that the management of the Bell System is dedicated to the national goal of reducing energy consumption. The comprehensive energy conservation program we have in effect includes gasoline and we plan to monitor the results of this program.

Please give our comments your utmost consideration for inclusion in the Federal Energy Office's plans for gasoline rationing, for our concern is that our capability for furnishing telecommunication service to our country not be impaired or jeopardized.

If we in the Bell System can be of any further assistance please contact Mr. Henry M. Williams in our Washington Office (telephone 466-5563) or Mr. Michael Del Grande in our New York Office (telephone 212-393-3691).

Sincerely,


H. L. Kertz

F

before the
FEDERAL ENERGY OFFICE
Washington, D.C.
20461

In the Matter of)
)
Notice of Proposed Rule Making)
in re CLARIFICATIONS AND RE-) VISIONS TO PART 211)

COMMENTS OF FEDERAL COMMUNICATIONS COMMISSION

The Federal Communications Commission hereby files its comments in the above-captioned notice of rule making as published in the Federal Register, March 29, 1974, Volume 39 number 62, Part IV.

The Notice of Proposed Rule Making contains the following definition in Section 21.56:

"Telecommunications services" means the repair, operation, and maintenance of telephone, telegraph, and similar facilities, during periods of substantial disruption of normal service.

Although the proposed rules provide certain allocations of fuel and other petroleum products for "Telecommunications services", we believe the aforementioned definition is too narrowly constructed to assure that fuel and other petroleum products will be available in reasonable amounts for essential telecommunication. For example, it appears that provision of fuel and other petroleum products is to be allocated for use in connection with "Telecommunications services" only "during periods of substantial disruption of normal service". We would point out that, if the integrity of communication services is to be preserved so as to be able to provide satisfactory service during emergencies and at other times, it is necessary that repair and preventive maintenance be carried out on an ongoing basis regardless of whether

there is a "substantial disruption of normal service". To do otherwise would invite and, indeed, lead to substantial degradation and disruption of telecommunication services. Further, if the communication requirements for government, national defense, and the general public are to be met by communications common carriers, it is essential to provide that the allocation of fuel and other petroleum products be applicable to construction of new plant; construction of such plant is generally not undertaken absent a finding that the public interest, convenience and necessity require the construction and operation of such facilities. In addition, it appears that the definition of "Telecommunications services" would exclude the allocation of fuel and other petroleum products which are essential to the operation of broadcast stations and the Emergency Broadcast System which are vital for the dissemination of news and other information to the general public in connection with natural disasters, national defense, etc. We believe these apparent oversights can be corrected by adopting the following amended definition of Telecommunications services:

"Telecommunications services" means the construction, operation, and maintenance of voice, data, telegraph, video, and similar facilities for services to the public by a communications common carrier. In addition, it includes the construction, repair, operation and maintenance of broadcast station, the Emergency Broadcast System, and Cable Television Systems.

It is our understanding that in Section 211.103 (c) through oversight no provision was made for allocation of motor gasoline for telecommunications services. Accordingly, we recommend that " (iv) Telecommunications services" be inserted in Section 211.103 (c) (1).

Communications common carriers are "end users" under the proposed rules which contain the following provisions:

S211.11 Basis for purchaser's entitlement to allocation.

* * *

(c) Transfer of entitlement--(1) General. The right to receive an allocation shall not be assignable separately but shall be considered an integral part of the on-going business or established end use.

(2) End-users and wholesale purchasers-consumers. The right to an allocation for an end use shall be deemed to have been transferred only when the entire business or activity of the firm is transferred to a successor firm.

From time to time communications common carriers sell, transfer, and exchange common carrier facilities, e.g. telephone exchanges, transmission lines, and other facilities in connection with their operations. However, such disposal frequently does not encompass "the entire business or activity of the firm * * to a successor firm". In such situations, the provisions of proposed Section 211.11(e)(1) and (2) would apparently deprive the "successor" firm from an allocation of fuel or other petroleum products essential to the continued maintenance, repair, and operation of the segment of the business acquired. We believe that this apparent oversight could be remedied by addition of the following to the existing language of (2):

(2) * * *, Provided, however, that a prorated transfer of a part of an allocation may be effected where a sale, transfer, or exchange of a part of the business of one communications common carrier to a successor communications common carrier is involved.

IT IS RECOMMENDED, That the Federal Energy Office make the aforementioned changes in its proposed rules.

FEDERAL COMMUNICATIONS COMMISSION

Vincent J. Mullins
Secretary

4-8-74

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AT&T

Hubert L. Kerlz
Vice President

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195 Broadway
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Phone (212) 393-1000

APR 8 1974

Executive Secretariat
Federal Energy Office
Box AF
Washington, D.C. 20461

Dear Sir:

The following comments are submitted as the Bell System's response to the Federal Energy Office's Proposed Rules of Clarifications and Revisions to Title 10 of the Code of Federal Regulations, Part 211 as published in the March 29, 1974 Federal Register. Please accept the following comments which are directed to the appropriate subparts.

Subpart B - Definitions

Section 211.51 - General Definitions

We now have the experience of this past winter's shortages of gasoline behind us and this experience has completely supported the concerns with the definition of "telecommunications services" that was expressed to Mr. William Walker, General Counsel of the Federal Energy Office in our letter of January 25, 1974, and to the Executive Secretariat of the Federal Energy Office in correspondence dated January 31, 1974.

During the shortage period several Telephone Companies were continually faced with the dilemma of obtaining critical fuel relief through prescribed channels or getting into service difficulty situations. We were fortunate in that during this period we were able to provide adequate telecommunications service to the nation with only a minimal amount of disruption that was attributed to a lack of adequate gasoline supplies. However, this continuous race to secure adequate supplies of gasoline and meet service commitments caused us to experience inefficiencies of operation and in many cases actually caused us to consume more gasoline. Even more important, it exposed many customers to a possible interruption of service or longer interval of being without service before restoration could be effected. We strongly feel that we should not be forced into managing the