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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

February 23, 1993

Office of the Secretary
Federal Communications Commission
Washington, DC 20554

Subject: In the Matter of:
Replacement of Part 90 by Part 88 to Revise the Private Land Mobile Radio Service and Modify the Policies Governing Them
PR Docket No. 92-235

Comments to Proposed Rule Making

The following comments pertain to hospital use of two-way radio and radio paging and are based on the Kansas City Area Hospital Association's 20+ years of experience in coordinating the Hospital Emergency Administrative Radio (HEAR) system among 39 hospitals and 18 emergency medical service dispatchers in the 10-county, bi-state Greater Kansas City (MO) area. The HEAR system (currently at 155.340 MHz) is used both in times of area-wide disasters and in day-to-day emergency operation of basic life support ambulance communications regarding patients being transported to hospitals for treatment.

We support, in principle, the technical and operational methods of obtaining additional frequency channels described in the proposed rule making, with the following suggestions:

> Due to the critical nature of hospital radio communications, we believe hospitals (which under the current Part 90 rules are classified in the Special Emergency section) should be classified under the new rules in the Emergency Medical Radio Service (rather than in the Non-Commercial section of the proposed Part 88 rules). These communications are directly related to life support, patient care and public safety. In the Greater Kansas City area, hospital radio communications currently compete with several school bus operators and others, and are therefore limited in the current Special Emergency frequencies which can be licensed. The need for radio communications in the hospital operations has grown in past years and is on the threshold of even greater expansion with the utilization of newer technologies. This expansion has been stymied by the lack of licensable frequencies.

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List A B C D E

For years all hospital-to-hospital radio communications, as well as communications between Basic Life Support ambulance services and hospitals, in the greater Kansas City area have been conducted on 155.340 MHz. We request this frequency be retained for exclusive hospital use and request four adjacent frequencies be reserved for ambulance-to-hospital communications. Additional frequencies are needed in order to separate this radio traffic geographically, because one ambulance calling a hospital will currently tie up the entire communications network. During area-wide emergencies, this network must remain free to be used for hospital-to-hospital transmission of vital treatment capability information while, at the same time, ambulances must communicate to hospitals regarding patients being brought for emergency treatment.

We request hospitals in the Kansas City area be able to license an additional radio frequency pair in the 800 MHz spectrum to improve transmission of multi-hospital readiness data to ambulance dispatchers in the area. Recently, other communities have put in place computer-linked communications regarding both hospital treatment capability during area-wide emergencies and day-to-day hospital information regarding the need for ambulance diversions. Ambulance diversions are a growing concern in the greater Kansas City area as violence and overall use of emergency rooms has mushroomed in the past few years. These computer-linked systems, operating through radio-packet modem transmission with telephone lines as a backup, can transmit vital hospital treatment capability information instantaneously among hospitals and to ambulance dispatch centers, whether or not phone lines are operational (e.g., as in a tornado or violent thunderstorm). This up-to-the-minute information can facilitate the transport of victims to the hospital which is best equipped to care for them, without the need for re-transport due to lack of proper treatment capability at the time of need.

The current Special Emergency paging frequencies of 152.0075 MHz, 157.450 MHz and 163.250 MHz are all in use in the Kansas City area. Additional radio paging frequencies are needed to ensure hospitals' quick response from their medical personnel.

Your consideration of the above can benefit all metropolitan hospitals and ambulance services and can greatly contribute to better patient treatment outcomes.

Sincerely,

R. Paul Whitaker
Vice President, Health Resources Management

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