

A Subsidiary of **ELI GULF INDUSTRIES, INC.**

February 10, 1993

Office of the Secretary  
 Federal Communications Commission  
 Washington, D.C. 20554

Re : Proposed Part 88 Comments. PR Docket No. 92-235

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Dear Commissioner:

FEDERAL COMMUNICATIONS COMMISSION  
 OFFICE OF THE SECRETARY

Signal Communications Corporation strongly supports the Commission's efforts in revising the current rules governing the PLMR services to promote more efficient use of the frequency spectrum.

Signal Communications is a manufacturer of radio Call Boxes typically used for highway emergency and municipal fire alarm systems. In recent years we have encountered difficulties in installing new systems due to unavailable frequencies. The frequencies listed in 90.257(a)(1) or 88.1189(a) which allow call box operations are shared with high powered transmitters, such as paging station, which make it extremely difficult to find an interference free channel in most areas. Call Box transmitters with a 1 watt ERP limited to 2 second transmissions and an omnidirectional antenna 20 feet above ground are often subject to co-channel interference from other stations located over 100 miles away.

We would appreciate your attention to the following comments that Signal Communications has regarding the proposed part 88.

**1. Classification of Call Boxes:**

Call Box transmitters have been classified as FXT in the past due to the large number of boxes and the difficulty in determining exact coordinates for each fixed transmitter. Every license application is filed along with a waiver request of 90.137(b) or 88.95(b) to allow operation for a period of 5 years pursuant to 90.149(a) or 88.119(a).

We propose that Call Box transmitters be classified as FX stations and be exempt from providing exact coordinates for each transmitter. Furthermore, in an effort to reduce paperwork, more than 6 transmitters should be authorized under the same callsign when operating on the same frequency in one common geographical area such as a section of highway. This will minimize the number of license applications filed for each system.

**2. Operating Limitations:**

In addition to the frequencies available for Call Box operations listed under 88.1189 and subject to the limitations of 88.1263,

we propose to the Commission to allow **voice** and **non-voice** operations for Call Boxes in other frequency bands.

**a. Frequencies**

Allow Call Box operations on the new narrowband frequencies below 512 MHz available under subpart D of part 88 in the Public Safety Radio Service and/or the General Category pool subject to the following requirements.

**b. Technical Standards**

Call Box equipment must meet the operating requirements set forth in subpart C of part 88 in the corresponding frequency band. In addition, the antenna height of any Call Box transmitter will be limited to 20 feet above ground level. For Base Stations, the antenna height will be limited to the requirements of 88.429. Call box and base station transmitters must operate within the output power requirements of 88.429.

**c. On-Air Time Limit**

Each Call Box must be equipped with a timer to deactivate the transmitter after being on the air for 3 minutes. The 3 minute time limit may be manually extended by the operator from the base station if deemed necessary. In addition, provisions must be made to allow manual deactivation of any Call Box transmitter from the base station.

The low output power, duty cycle and antenna height of Call Box transmitters allows them to operate with no harmful interference to surrounding systems.

Finally, we would like to express the importance of Call Box systems in saving life and property and providing people with the security needed in emergency situations. Therefore we feel that these systems must be given a higher priority in the proposed part 88 rules. We would also like to thank the Commission for giving this matter the attention that it deserves.

Sincerely,



Nadim Farhat  
Engineering Manager  
Signal Communications Corp.