

ORIGINAL

EX PARTE OR LATE FILED

**Yellow Cab of San Diego, Inc.**

639 Thirteenth Street  
San Diego, California 92101  
(619) 239-8061

RECEIVED

NOV 15 1993

DOCKET FILE COPY ORIGINAL

FCC - MAIL ROOM

November 10, 1993

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
191 M Street N.W.  
Room 222  
Washington, D.C. 20554

RE: PR Docket No. 92-235

Dear Mr. Secretary:

Yellow Cab of San Diego, Inc. is the largest taxicab operator in the greater San Diego area and a licensee of your Commission.

I have been informed that the Commission is considering a proposal for consolidating the Taxicab Radio Service with Business Radio users or some other broad pool of user groups. I want to express my strong opposition to such an idea. Over 85% of all requests for service to our company must be radio dispatched. Any changes to the coordination system will, in my opinion, have a major negative impact on our company and our ability to properly serve the public.

Secondly, any interference with our radio transmissions will have life-threatening consequences for taxicab drivers. According to an alert dated September 1993 published by the U.S. Department of Health and Human Services, Centers for Disease Control and Prevention, National Institute for Occupational Safety and Health (NIOSH), entitled "Request for Assistance in Preventing Homicide in the Workplace", page 3 states in part, "...Taxicab establishments had the highest rate of occupational homicide--nearly 40 times the national average and more than three times the rate of liquor stores, which had the next highest rate." It is my opinion that clear and unencumbered radio transmissions are essential to driver safety.

No. of Copies rec'd 056  
List A B C D E

Mr. William F. Caton  
November 10, 1993  
Page 2

The existing coordination system works very well and requires no changes. However, should the Commission find it necessary to consolidate licenses into some sort of pool, I would strongly urge that the Taxicab Radio Service be consolidated with other compatible groups in a Land Transportation pool.

I have taken the liberty of enclosing five copies of this letter for the Commissioners and the docket file.

Sincerely,



Anthony M. Palmeri  
Vice-president and General Manager

enc.

DOCKET FILE COPY ORIGINAL



Limousine Service  
at Taxicab Prices

# TWR Express Inc.

Customer Service (718) 472-5450 Bookkeeping (718) 472-5659 Fax (718) 472-5551

38-30 Crescent Street · Long Island City, NY 11101

November 9, 1993

Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

RE: PR Docket No. 92-235

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NOV 15 1993

FCC - MAIL ROOM

Ladies and Gentlemen:

I am writing this letter to stress how important it is that my taxi company and others like it not be required to share channels with compatible users.

In particular there is no way that an active taxi company can share its paired channels with simples (single-channel) Business Radio users. The resulting interference will not only jeopardize the efficiency of my business, but also the safety of my drivers.

If you must consolidate private radio services, please make sure that we are at least grouped with other Land Transportation users.

Five copies of this letter are included for the Commissioners and the docket file.

Sincerely,

Nick Zarbanelian  
(General Manager)

cc: All Commissioners

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List A B C D E

5 orig

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ORIGINAL

FCC - MAIL ROOM

FAX NUMBER (803) 853-7172

P.O. BOX 6091 • CHARLESTON, SOUTH CAROLINA 29405  
TELEPHONE: (803) 577-6565

NOVEMBER 9, 1993

MR. WILLIAM F. CATON  
ACTING SECRETARY  
FEDERAL COMMUNICATIONS COMMISSION  
1919 M. STREET N.W., ROOM 222  
WASHINGTON, D. C. 20554

RE: PR DOCKET NO. 92-235

DEAR MR. CATON:

THIS LETTER IS WRITTEN IN CONNECTION WITH THE FCC'S CONSIDERATION OF VARIOUS PROPOSALS TO CONSOLIDATE PRIVATE RADIO SERVICES. IN PARTICULAR, I AM WRITING TO EXPRESS MY STRONG OPPOSITION TO THE NOTION ADVANCED THAT THE TAXICAB RADIO SERVICE BE CONSOLIDATED WITH BUSINESS RADIO USERS.

I AM G. S. CROSBY, SR., PRESIDENT OF YELLOW CAB COMPANY OF CHARLESTON HERE IN CHARLESTON, S. C. I HAVE BEEN IN THE PUBLIC TRANSPORTATION BUSINESS SINCE MARCH OF 1960. I RUN ABOUT SIXTY FIVE (65) TO SEVENTY (70) TAXI CABS EVERY DAY, TWENTY FOUR HOURS A DAY, SEVEN DAYS A WEEK. I HAVE CONTRACTS WITH THE V.A. HOSPITAL, NAVAL HOSPITAL, NAVY YARD AT CHARLESTON, CHARLESTON INTERNATIONAL AIRPORT AND MANY OTHER DOCTORS AND HOSPITALS HERE IN THE CHARLESTON AREA.

MY COMPANY IS A LICENSEE IN THE TAXICAB RADIO SERVICE. MY COMPANY PROVIDES AN IMPORTANT SERVICE IN THE NATURE OF A PUBLIC UTILITY. INTERFERENCE-FREE RADIO COMMUNICATIONS ARE ESSENTIAL TO TIMELY AND EFFICIENT DELIVERY OF OUR PUBLIC TRANSPORTATION SERVICE. DUE TO THE DIFFERENCES IN THE WAY TAXI AND GENERAL BUSINESS OPERATORS UTILIZES RADIO, ANY REQUIREMENT THAT THE TWO GROUPS SHARE FREQUENCIES IS A PRESCRIPTION FOR INTERFERENCE AND COSTLY INEFFICIENCIES.

PERHAPS EVEN MORE IMPORTANT, ANY REQUIREMENT THAT THE TWO GROUPS SHARE FREQUENCIES COULD JEOPARDIZE THE SAFETY OF TAXI DRIVERS WHO ARE 21 TIMES MORE LIKELY TO BE MURDERED ON THE JOB THAN THE AVERAGE WORKER.

FOR THESE REASONS I URGE YOU TO AVOID ANY CONSOLIDATION OF THE TAXICAB AND BUSINESS RADIO SERVICES. LASTLY I ALSO URGE YOU TO AVOID ANY CONSOLIDATION WHICH WOULD MERGE ALL 19 RADIO SERVICES INTO THREE OR FOUR BROAD CATCH-ALL POOLS. HERE AGAIN USER COMPATIBILITY WOULD BE LOST WITHOUT ANY MATERIAL GAINS. IF THE TAXICAB RADIO SERVICE IS TO BE CONSOLIDATED WITH ANYONE, IT SHOULD BE WITH OTHER COMPATIBLE USERS IN A LAND TRANSPORTATION POOL.

G. S. CROSBY, SR.  
PRESIDENT

No. of Copies rec'd  
List A B C D E

*G. Crosby*  
KENNETH L. HALLEY  
VICE PRESIDENT

FIVE COPIES OF THIS LETTER ARE BEING FURNISHED FOR THE COMMISSIONERS AND FOR INCLUSION IN THE DOCKET OF THIS PROCEEDING.

SINCERELY,



G. S. CROSBY, SR.  
PRESIDENT

cc: ALL COMMISSIONERS

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NOV 15 1993

FCC - MAIL ROOM

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**MAYFLOWER**  
CONTRACT SERVICES

Mayflower Contract Services, Inc.  
4780 Library Road  
P.O. Box 215  
Bethel Park, Pennsylvania 15102  
(412) 833-3300

November 8, 1993

Mr. William F. Canton  
Acting Secretary  
Federal Communications Commission  
1919 M Street N.W.  
Room 222  
Washington, D.C. 20554

Re: PR Docket No. 92-235

Dear Mr. Canton:

I am writing to express my opposition to the FCC's consideration of various proposals to consolidate private radio service. Specifically, I am strongly against the consolidation of the Taxicabs Radio Service with Business Radio users.

As a Taxicab Radio Service and a Public Utility provider, interference free radio communications are essential to the timely and efficient delivery of our public transportation service. General business operators utilize radio systems in a different fashion in comparison to taxi operators. These differences will cause significant interference and costly inefficiencies. They will also jeopardize the safety of taxi drivers who are twenty-one times more likely to be murdered on the job than the average worker.

The consolidation of the Taxicab and Business Radio Services, for the above reasons, should be avoided.

Also, please do not consolidate all nineteen Radio Services into three or four broad catch all pools. Again, safety concerns and costly inefficiencies will abound. If any consolidation is to take place, the Taxicab Radio Service is most compatible with users in a Land Transportation pool.

I have enclosed five copies of this letter for the commissioners and for inclusion in the docket of this proceeding.

I greatly appreciate your consideration.

Sincerely,

  
Beverly A. Edwards  
Sr. Operations Manager

cc. All Commissioners

No. of Copies rec'd 6 Copies  
List ABCDE



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**BERGEN**  
**TRANSPORTATION**  
**SERVICES**

125 Piermont Road P.O. Box 100 Tenafly, New Jersey 07670  
 567-2800 568-1828 487-2000 837-3100

November 8, 1993

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NOV 15 1993

FCC - MAIL ROOM

Mr. William F. Caton  
 Acting Secretary  
 Federal Communications Commission  
 1919 M Street N.W.  
 Room 222  
 Washington, D.C. 20554

Re: PR Docket No. 92-235

Dear Mr. Caton.

I am writing with regard to the proposals for the consolidation of private radio services presently being considered by the F.C.C. These proposals suggest that the Taxicab Radio Service be merged with Business Radio users - this prospect would be extremely damaging to our industry, and as such, I must voice my strong opposition to it.

Our transportation company consists of 30 cars, all of which are radio-dispatched to over 1000 calls daily. We currently hold an F.C.C. license in the Taxicab Radio Service for this operation. As it stands, we presently share the frequency with several other services throughout the tri-state area, and as a result, our drivers experience reception problems because of these other companies. This situation would be compounded twofold should any of these proposals be enacted.

Bear in mind that we are in a service industry - we provide an important service to the community, and it is essential that our communications remain as clear as possible to facilitate timely service. Our customers, the riding public, depend on it. Because of the differences in the nature of radio use between taxi and general businesses, the aforementioned sharing of frequencies will prove extremely detrimental not only to our company, but to the public, who rely on us for transportation.

As you may have heard, a report was recently released in which a taxi driver's job was listed among the top three most dangerous in America - more so than a New York City Police Officer. Our drivers can attest to that, and to the fact that having use of a radio has made a difference. Over the past three months alone, our drivers were robbed at knifepoint six times - The perpetrator was apprehended with the help of our two-way radio system, and the driver who was using it. His safety would have been jeopardized if he had been unable to get through on the radio.

Lastly, I will point to the age and size of the system - the taxi industry has been using the same system since 1945 - needless to say, the industry has grown very much since then. Yet we are still using the same system, which is growing more crowded as time goes by. We have attempted to utilize data over our frequency in an effort to improve our service and reduce radio time, but because of the already-overcrowded nature of the band, there are no available frequencies for this use.

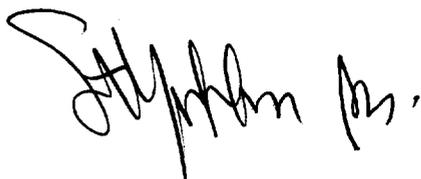
I understand that an alternative has been offered in which all 19 Radio Services would be merged into 3 or 4 pools - I feel this would result in the same end - more crowding with no positive gain.

If, indeed, the Taxicab Radio Service must be merged with any other radio users, I suggest that it be consolidated with other compatible users in a Land Transportation Pool.

Five copies of this letter are being furnished for the commissioners, and for inclusion in the docket of this proceeding.

Should you have any questions, please do not hesitate to contact me at your earliest convenience. Until then, I remain

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Steven Yablon".

Steven Yablon  
President

cc: All Commissioners

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# BLACK AND WHITE CABS

RECEIVED

NOV 15 1993

FCC - MAIL ROOM

November 8, 1993

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M. Street N.W.  
Room 222  
Washington, D.C. 20554

RE: PR Docket No. 92-235

Dear Mr. Caton:

I am writing to express my strong opposition to the notion advanced that the Taxicab Radio Service be consolidated with Business Radio users.

My company provides an important service in the nature of a public utility with over 10,000 transmissions a week between company and drivers.

Interference-free radio communications are essential to timely and efficient delivery of our public transportation service.

Any requirement that the Taxicab Radio Service and Business Radio Users share frequencies is a prescription for interference and costly inefficiencies.

Perhaps even more important, any requirement that the two groups share frequencies could jeopardize the safety of taxi drivers who are 21 times more likely to be murdered on the job than the average worker.

For these reasons, I urge you to avoid any consolidation of the Taxicab and Business Radio Services.

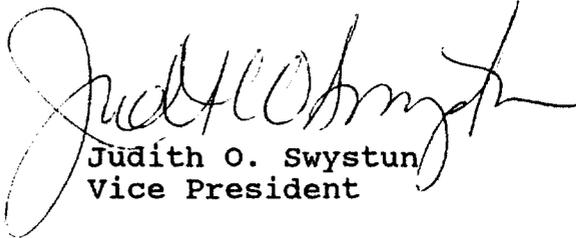
If the Taxicab Radio Service is to be consolidated with anyone, it should be with other compatible users in a Land Transportation pool.

No. of Copies rec'd 5 Copies  
List A B C D E

Lastly I also urge you to avoid any consolidation which would merge all 19 Radio Services into three or four broad catch-all pools. Here again user compatibility would be lost without any material gain.

Five copies of this letter are being furnished for the commissioners and for inclusion in the docket of this proceeding.

Sincerely,



Judith O. Swystun  
Vice President

cc: All Commissioners

# LANGLEY CABS

November 8, 1993

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NOV 15 1993

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M. Street N.W.  
Room 222  
Washington, D.C. 20554

FCC - MAIL ROOM

RE: PR Docket No. 92-235

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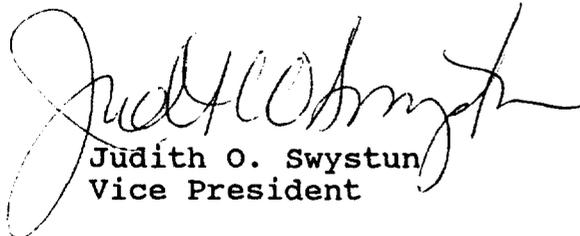
If the Taxicab Radio Service is to be consolidated with anyone, it should be with other compatible users in a Land Transportation pool.

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List A B C D E

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Five copies of this letter are being furnished for the commissioners and for inclusion in the docket of this proceeding.

Sincerely,



Judith O. Swystun  
Vice President

cc: All Commissioners

DOCKET FILE COPY ORIGINAL

**Darien Yellow Cab, Inc.**

**ORIGINAL**

DOCKET FILE COPY ORIGINAL

*Squab Lane*

EX PARTE OR LATE FILED

*P.O. Box 15 • Darien, CT 06820*

*Taxi Service • 655-8779*

*Business Office • 866-2542*

**RECEIVED**  
NOV 15 1993  
**MAIL BRANCH**

November 11, 1993

Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: PR Docket No. 92-235

Dear Ladies and Gentlemen:

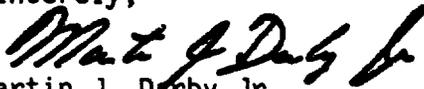
I am writing to stress how important it is that my busy taxi company and others like it not be required to share channels with incompatible users.

There is no way that an active company can share its paired channels with single-channel Business Radio users. The resulting confusion and interference will not only jeopardize the efficiency of my business, but also the safety of my drivers.

If you must consolidate private radio services, please make sure that we are grouped with other Land Transportation users so as to minimize the inconvenience.

Five copies of this letter are included for the Commissioners and the Docket file.

Sincerely,



Martin J. Darby Jr.  
President

cc:All Commissioners

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DOCKET FILE COPY ORIGINAL

Transportation Plus Inc.  
100 South Easterling Street  
Dalton, Georgia 30721-3234

EX PARTE OR LATE FILED

November 9, 1993

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street N.W.  
Room 222  
Washington, D.C. 20554

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(NOV 15 1993  
FCC - MAIL ROOM

Re: PR Docket No. 92-235

Dear Mr. Caton:

This letter is written in connection with the FCC's consideration of various proposals to consolidate private radio services. In particular I am writing to express my strong opposition to the notion advanced that the Taxicab Radio Service be consolidated with Business Radio users.

By way of background, my company is a licensee in the Taxicab Radio Service. My company provides an important service in the nature of a public utility. Interference-free radio communications are essential to timely and efficient delivery of our public transportation service. Due to the differences in the way taxi and general business operators utilizes radio, any requirement that the two groups share frequencies is a prescription for interference and costly inefficiencies.

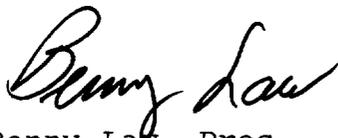
Perhaps even more important, any requirement that the two groups share frequencies could jeopardize the safety of taxi drivers who are 21 times more likely to be murdered on the job than the average worker.

For these reasons I urge you to avoid any consolidation of the Taxicab and Business Radio Services.

Lastly I also urge you to avoid any consolidation which would merge all 19 Radio Services into three or four broad catch-all pools. Here again user compatibility would be lost without material gains. If the Taxicab Radio Service is to be consolidated with anyone, it should be with other compatible users in a Land Transportation pool.

Five copies of this letter are being furnished for the commissioners and for inclusion in the docket of this proceeding.

Sincerely,



Benny Law, Pres.

cc: All Commissioners

No. of Copies rec'd 5 Copies  
List A B C D E

**BRENTWOOD TRANSPORTATION CO.**

POST OFFICE BOX 219  
BURLINGTON, MA. 01803  
(617) 229-0000

November 8, 1993

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street N.W.  
Room 222  
Washington, D.C. 20554

Re: PR Docket No. 92-235

Dear Mr. Caton:

This letter is written in connection with the FCC's consideration of various proposals to consolidate private radio services. In particular I am writing to express my strong opposition to the notion advanced that the Taxicab Radio Service be consolidated with Business Radio users.

By way of background, my company is a licensee in the Taxicab Radio Service. My company provides an important service in the nature of a public utility. Interference-free radio communications are essential to timely and efficient delivery of our public transportation service. Due to the differences in the way taxi and general business operators utilizes radio, any requirement that the two groups share frequencies is a prescription for interference and costly inefficiencies.

Perhaps even more important, any requirement that the two groups share frequencies could jeopardize the safety of taxi drivers who are 21 times more likely to be murdered on the job than the average worker.

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Sincerely,



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5 Copies

DOCKET FILE COPY ORIGINAL

Dalton Leasing Inc.  
d/b/a Dalton Taxicab  
100 South Easterling Street  
Dalton, Georgia 30721-3234

EX PARTE OR LATE FILED

November 9, 1993

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street N.W.  
Room 222  
Washington, D.C. 20554

RECEIVED

NOV 15 1993

FCC - MAIL ROOM

Re: PR Docket No. 92-235

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By way of background, my company is a licensee in the Taxicab Radio Service. My company provides an important service in the nature of a public utility. Interference-free radio communications are essential to timely and efficient delivery of our public transportation service. Due to the differences in the way taxi and general business operators utilizes radio, any requirement that the two groups share frequencies is a prescription for interference and costly inefficiencies.

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Five copies of this letter are being furnished for the commissioners and for inclusion in the docket of this proceeding.

Sincerely,



Benny Law, Pres.

cc: All Commissioners

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5 Copies

EX PARTE OR LATE FILED

**YELLOW CAB COMPANY OF LOUISVILLE**

DOCKET FILE COPY ORIGINAL

P.O. BOX 2107 • LOUISVILLE, KENTUCKY 40201  
502-637-6511

RECEIVED

NOV 15 1993

FCC MAIL ROOM

November 9, 1993

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street N.W.  
Room 222  
Washington, D.C. 20554

RE: PR Docket No. 92-235

Dear Mr. Secretary:

I am one of the owners of Yellow Cab Co. of Louisville and we are one of the licensees of your commission.

It's my understanding that it has been suggested that the Taxicab Radio Service in which we are a licensee should be consolidated with Business Radio users or in some broad pool made up of widely diversified user groups.

I am strongly opposed to this type of consolidation. I frankly don't believe there is a need for any consolidation because the existing coordination system is working very well and as a result we are able to both service the public for their transportation needs and have proper communications with our drivers.

Under no circumstances should Taxicab Radio users be consolidated with Business Radio users in a broad pool. If there must be some consolidation, at least consolidate the Taxicab Radio Service with other compatible groups in a Land Transportation Pool.

Copies of this letter are enclosed for the commissioners and the docket file.

Very truly yours,

*Donald G. McClinton*

Donald G. McClinton  
President

DGM/bjv

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