

DOCKET FILE COPY [REDACTED]

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NOV-15 1993

FCC MAIL ROOM

DOCKET FILE COPY ORIGINAL  
L.I. YELLOW CAB CORP.  
130 HEMPSTEAD TURNPIKE  
LEVITTOWN, NEW YORK 11756

November 10, 1993

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

RE: PR Docket No. 92-235

Gentleman:

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 incompatible users.

In particular there is no way that an active taxi company can share its paired channels with simplex (single channel) Business Radio users.

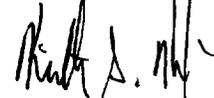
Since our local taxi ordinance prohibits taxicabs from cruising for fares, our radios are imperative to our operation and driver safety.

We strongly object to any changes in the structure of the existing radio channels, as it will adversely affect our business and our drivers income.

Five copies of this letter are included for your distribution.

Very truly yours,

L.I. YELLOW CAB CORP.



KEITH A. KAUFMAN  
Vice President

KAK/dw

37

Flash

(312) 878-8500

EX PARTE OF LA

ILLINOIS 60640

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DOCKET FILE

September 11, 1993

1993

MAIL BRANCH

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

RE: DOCKET NO. 92-235

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 incompatible users.

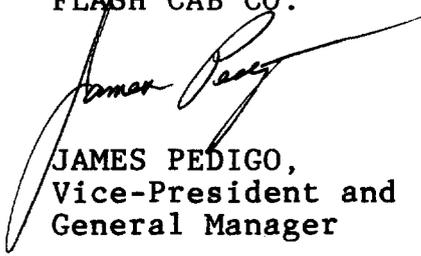
Flash Cab Co. has been providing quality radio service to the people of Chicago for nearly fifty years, we handle 70 - 80,000 orders per month, with a new automated dispatch system we are installing at great expense we hope to raise this to 100 - 125,000 orders per month. Sharing a channel would prove a hardship to the company - our customers and last but not least our drivers, whose income would surely suffer.

Last year the City of Chicago ordered all taxicabs to have a safety system installed. Our Company chose World Trax, a GPS tracking system, if we do not have constant communication with our cars - the tracking system would be worthless and could put our drivers in grave danger.

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

Sincerely,

FLASH CAB CO.



JAMES PEDIGO,  
Vice-President and  
General Manager

JP/sl  
Encls.

CC: International Taxicab and Livery Association

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NOV 15 1993

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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

KENNETH L. HALLEY  
VICE PRESIDENT

# 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

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.

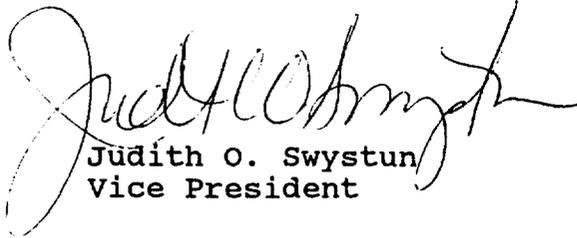
For these reasons, I urge you to avoid any consolidation of the Taxicab and Business Radio Services.

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

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

EX PARTE OR LATE FILED

~~CONFIDENTIAL~~ **Norwalk Yellow Cab, Inc.**

7 Monroe Street

P.O. Box 701 • Norwalk, CT 06852

Taxi Service • 853-1267

Business Office • 866-2542

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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:

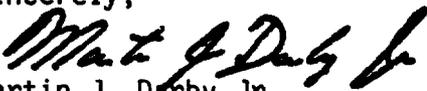
I am writing to stress how important it is that my busy taxi company and others like it not be required to share channels with incompatible users.

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

DOCKET FILE COPY ORIGINAL

DOCKET FILE COPY [REDACTED]

D A L Y C I T Y C A B , I N C .

39 WELLINGTON AVENUE DALY CITY CA, 94014  
415 992-8865

RECEIVED

NOV 15 1993

FCC - MAIL ROOM

NOVEMBER 10, 1993

FEDERAL COMMUNICATIONS COMMISSION  
1919 M STREET, N.W.  
WASHINGTON, D.C. 20554

RE: PR DOCKET #92-235

LADIES AND GENTLEMEN:

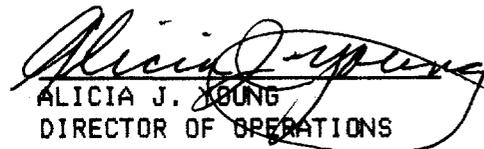
THE BOARD OF DIRECTORS OF DALY CITY CAB, INC. ASKED ME TO WRITE THIS LETTER TO STRESS HOW IMPORTANT IT IS THAT OUR OPERATION, AS WELL AS THAT OF OTHER ENTERPRISES SIMILAR TO OURS NOT BE REQUIRED TO SHARE CHANNELS WITH INCOMPATIBLE USERS.

IN PARTICULAR THERE IS NO WAY THAT AN ACTIVE TAXICAB COMPANY CAN SHARE ITS PAIRED CHANNELS WITH SIMPLEX (SINGLE-CHANNEL) BUSINESS RADIO USERS. THE RESULTING INTERFERENCE WILL NOT ONLY JEOPARDIZE THE EFFICIENCY OF THE ENTIRE INDUSTRY, BUT ALSO THE SAFETY OF EVERY DRIVER.

IF YOU MUST CONSOLIDATE PRIVATE RADIO SERVICES, PLEASE MAKE SURE THAT WE ARE AT LEAST GROUPED WITH OTHER LAND TRANSPORTATION USERS.

I INCLUDE FIVE COPIES OF MY LETTER FOR THE COMMISSIONERS AND THE DOCKET FILE.

SINCERELY,

  
ALICIA J. YOUNG  
DIRECTOR OF OPERATIONS

AJY/rm

CC: ALL COMMISSIONERS  
FILES

# Billings Yellow Cab

P.O. Box 21011 • Billings, MT 59104

11-8-93

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

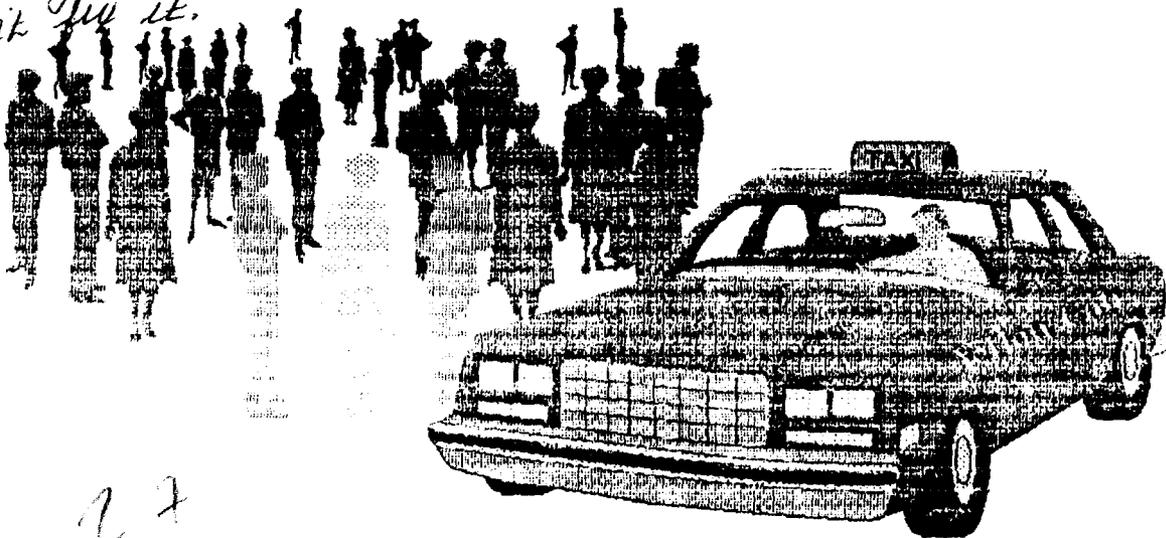
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NOV 15 1993

FCC - MAIL ROOM

Dear Mr. Secretary:

I am the owner of a Taxicab company in Billings, Montana and a licensee of your Commission. I understand that some have suggested that the Taxicab Radio Service in which I am licensee should be consolidated with Business Radio users on in some broad pool consisting of a wide diversity of user groups. I want to express my strong opposition to such an idea. First of all I see no need for consolidation at all; the existing coordination system works and "if it aint broke, dont fix it."



# Billings Yellow Cab

P.O. Box 21011 • Billings, MT 59104

Second, under no circumstances should Taxicab Radio users be consolidated with Business Radio users or in a broad pool.

Third, if there must be some consolidation, at least consolidate the Taxicab Radio Service with other compatible groups in a Land Transportation pool.

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

Sincerely,  
Jenni B. Bekker  
President

cc: All Commissioners



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**MIAMI-LIBERTY CAB CO.**

PHONE 222-2822

PHONE 222-4011

1124 E. SECOND STREET

DAYTON, OHIO 45403

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. Caton:

This letter is written in regards to the FCC's consideration of different proposals to consolidate private radio services. My writing is particularly focused on the idea of consolidating the Taxicab Radio Service with Business Radio users. Of this idea, I wish to express my strong opposition.

Regarding our background, my company is a licensee in the Taxicab Radio Service. My company, Miami-Liberty Cab Company, provides an important service in the nature of a public utility. In 1992, we logged nearly 1.5 million miles and transported nearly 200,000 passengers with a fleet of 32 taxicabs and 9 vans of which 8 are equipped with wheelchair lifts. Many of our passengers endure multiple disabilities, some more severe than others. Interference-free radio communications are essential to safe, timely, and efficient delivery of our public transportation service. Due to the differences in the way taxi and general business operators utilize radio, any requirement that the two groups share frequencies is a prescription for interference and costly inefficiencies.

My past experience in the business radio service uniquely qualifies me to offer insight into some of the problems that would befall both groups if they were consolidated on the same frequencies. Most communications with taxicabs are extremely short and quick, with an average of eight to ten conversations occurring in one minute. On the other hand, business radio communications are much longer and slower with an average of one conversation lasting five minutes. With many business radio users interconnecting their base radios with their office telephone, the length of an average conversation increases dramatically.

Mr. William F. Caton  
PR Docket No. 92-235  
November 9, 1993

If one of our customers were to call and advise us to tell the cab driver that he is at the wrong pickup location or that he wishes to change the time of pickup, **lengthy delays could be experienced by the customer**, the driver, and our dispatcher as they would all have to wait for any ongoing business radio conversation to end.

Unlike the days of old, where cabs would cruise the streets looking for fares, most of the trips today are requested by telephone and relayed to the driver by two-way radio. This **saves gasoline** and helps to **reduce congestion** on our streets as well as **minimizing the pollution** of our air.

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.

*As recent as October 2nd, 1993 a cab driver of a Miami-Liberty Cab was forced at gunpoint to drive around the city of Dayton for four (4) hours with his assailants directing his every move. We are convinced that quick thinking by our dispatcher and a clear radio channel are the only things that saved his life. When she realized that he may be in danger, she immediately directed all of the other cabs on the street to be on the lookout for his cab. Her constant chatter on the otherwise clear radio channel caused the assailants to believe that their apprehension was near and prompted them to take off running on foot without firing a single shot.*

I understand the need for constantly reassessing the methods by which we operate, but as we challenge traditional thinking please bear in mind that not all original thoughts are bad and many deserve to survive the challenge. **The separation of the Taxicab Radio Service from other radio users is an original idea that deserves to survive.**

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

Sincerely,



R. L. Schultz  
Assistant VP/GM  
Miami-Liberty Cab Co.

cc: All Commissioners

EX PARTE OR LATE FILED  
DAYTON PARATRANSIT ENTERPRISES LTD.

P.O. BOX 291  
DAYTON, OHIO 45401

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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. Caton:

This letter is written in connection with the FCC's consideration of various proposals to consolidate private radio services. I am especially concerned about the idea of consolidating the Taxicab Radio Service with Business Radio users. I wish to express my strong opposition.

By way of background, my company, Dayton Paratransit Enterprises Ltd., Inc., is a licensee in the Taxicab Radio Service. My company provides an important service in the nature of a public utility. Many of our passengers suffer from multiple disabilities, some more severe than others. Interference-free radio communications are essential to safe, timely, and efficient delivery of our public transportation service. Due to the differences in the way taxi and general business operators utilize radio, any requirement that the two groups share frequencies is a prescription for interference and costly inefficiencies.

Most communications with taxicabs are extremely short and quick, with an average of eight to ten conversations occurring in one minute. On the other hand, business radio communications are much longer and slower with an average of one conversation lasting five minutes. With many business radio users interconnecting their base radios with their office telephone, the length of an average conversation increases dramatically.

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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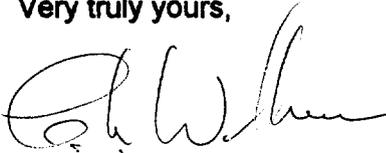
FCC - MAIL ROOM

Mr. William F. Caton  
PR Docket No. 92-235  
November 9, 1993

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

In conclusion, I also urge you to avoid any consolidation which would merge all 19 Radio Services into three or four broad catch-all pools. Once 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.

Very truly yours,



C. W. Walker  
President  
Dayton Paratransit Enterprises Ltd., Inc.

cc: All Commissioners

DOC 777

EX PARTE OR LATE FILED

# YELLOW CHECKER CAB CO.

2200 S. Riverside Drive • Fort Worth, Texas 76104  
817/534-7777

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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:

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 and it's affiliates are licensees in the Taxicab Radio Service. They provide an important service in the nature of a public utility and each of the three Texas locations may conduct more than 3,000 radio/dispatch transactions per 24 hour period. Interference-free radio communications is essential to timely and efficient delivery of our public transportation service. Due to differences in that 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.

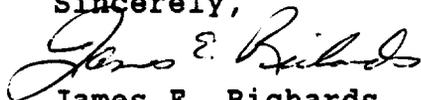
Lastly, I urge you to avoid any consolidation which would merge all 19 Radio Services into three or four broad catch-all pools. Here again user compatibility would be lost without material gains. If the Taxicab Radio Service is to be consolidated with

Page 2: Mr. Caton

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,

A handwritten signature in cursive script that reads "James E. Richards".

James E. Richards  
President

cc: All Commissioners



**B  
E  
R  
G  
E  
N** **TRANSPORTATION  
SERVICES**

125 Piermont Road P.O. Box 100 Tenafly, New Jersey 07670  
567-2888 568-1828 487-2000 837-3100

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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 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 "S. Yablon, President".

Steven Yablon  
President

cc: All Commissioners

DOCKET FILE

EX PARTE OR LATE FILED



# Alabama BancServ, Inc.

ABS Service • Air Carriers • BancServ Air • Yellow Cab

Tommy Morrow  
President

DOCKET FILE COPY ORIGINAL

November 10, 1993

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

NOV 15 1993

FCC - MAIL ROOM

Re: PR Docket No. 92-235

Ladies and Gentlemen:

I am writing this letter to stress how important it is that Yellow Cab Inc. of Birmingham and others like it not be required to share channels with incompatible users. We have an automated dispatch systems that transmits data as well as voice.

In particular there is no way that an active taxi company can share its paired channels with simplex (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,

A handwritten signature in cursive script, appearing to read 'Tommy Morrow', is written over the typed name.

Tommy Morrow President/Owner

cc: All Commissioners

TRANSPORTATION SPECIALIST

DOCKET FILE COPY

EX PARTE OR LATE FILED

From the Executive Office

*C.W.S. Transportation  
Connecticut Wheelchair Service, Inc.*

DOCKET FILE COPY ORIGINAL

NOVEMBER 9, 1993

68 Diamond Avenue  
P.O. Box 866  
Plainville, CT 06062-0866

FEDERAL COMMUNICATIONS COMMISSION  
1919 M STREET, N.W.  
WASHINGTON, D.C. 20554

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NOV 15 1993

RE: PR DOCKET NO. 92-235

FCC - MAIL ROOM

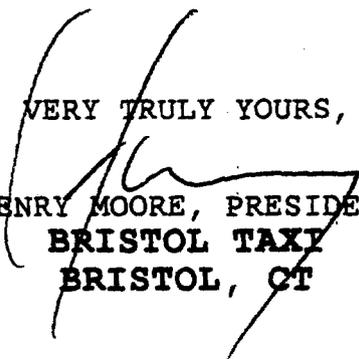
DEAR SIRs,

I AM AWARE THAT YOUR AGENCY IS CONTEMPLATING A MANDATE FOR TAXI PROVIDERS SUCH AS MYSELF TO SHARE FREQUENCIES WITH USERS WHO OPERATE INCOMPATIBLE SERVICES. IT IS DIFFICULT TO ENVISION THE MESS THAT WILL RESULT FROM THE MANDATE TO SHARE. INASMUCH AS OUR FIRM SERVES THE DISABLED AS WELL AS REGULAR PUBLIC, RADIO TRANSMISSIONS CAN BE LONGER AND MORE DETAILED THAN WOULD NORMALLY BE NECESSARY.

OURS IS A HIGH VOLUME RADIO DISPATCH SYSTEM SPANNING A LARGE GEOGRAPHICAL AREA. IT WOULD SEEM MOST APPROPRIATE TO GROUP OUR FREQUENCIES WITH THOSE USED BY OTHER LAND TRANSPORTATION PROVIDERS.

I HAVE ENCLOSED FIVE COPIES OF THIS LETTER FOR THE COMMISSIONERS AND THE DOCKET FILE.

VERY TRULY YOURS,

  
HENRY MOORE, PRESIDENT  
BRISTOL TAXI  
BRISTOL, CT

CC: ALL COMMISSIONERS



EX PARTE OR LATE FILED  
PHONE 855-9009

NORVIEW CARS, Inc.  
T/A NORFOLK CHECKER TAXI  
6304 Sewells Point Road  
NORFOLK, VA 23513



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NOV 15 1993

November 8, 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 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.

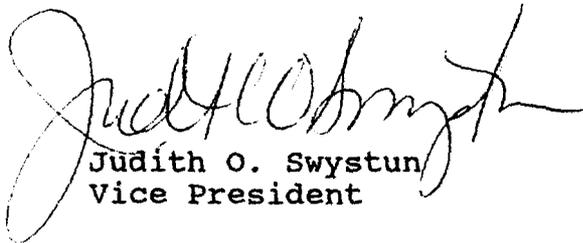
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Lastly I also urge you to avoid any consolidation which would merge all 19 Radio Services into three or four broad catch-all pools. Here again user compatibility would be lost without any material gain.

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



DOCKET FILE CO [REDACTED]

EX PARTE OR LATE FILED

CITY CAB COMPANY  
371 LISBON STREET  
LEWISTON, MAINE 04240  
(207) 784-4521

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NOV 15 1993

DOCKET FILE COPY ORIGINAL

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 the operator of a taxicab system and a licensee of your Commission.

I understand that some have suggested that the Taxicab Radio Service in which I am a licensee should be consolidated with Business Radio users or in some broad pool consisting of a wide diversity of user groups.

I want to express my strong opposition to such an idea. First of all I see no need for consolidation at all. The existing coordination system works; so, why change it.

Second, under no circumstances should Taxicab Radio users be consolidated with Business Radio users or in a broad pool.

Third, if there must be some consolidation, at least consolidate the Taxicab Radio Service with other compatible groups in a Land Transportation pool.

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

Sincerely,

  
Daniel J. Leonas  
President

DJL:jl  
cc: All Commissioners

EX PARTE OR LATE FILED

DOCKET FILE CO [REDACTED]

DOCKET FILE COPY ORIGINAL

DOCKET FILE COPY [REDACTED]

**H R P B COMPANY**  
Yellow & Checker Cabs  
220 South 2nd  
Saginaw, Michigan 48607

RECEIVED

NOV 15 1993

November 11, 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:

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.

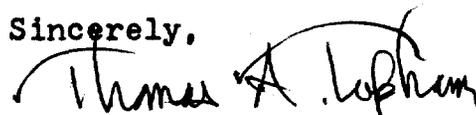
Perhaps even more important, any requirement that the two groups share frequencies could jeopardize the safety of taxi drivers who are 21 times more likely to be murdered on the job than the average worker.

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 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.

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

Sincerely,



cc: All Commissioners

EX PARTE OR LATE FILED

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DOCKET FILE COPY DUPLICATE



100 Piermont Road P.O. Box 100 Tenafly, New Jersey 07670  
867-2800 868-1828 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 "S. Yablon".

Steven Yablon  
President

cc: All Commissioners