

METER RATES

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AIRPORT SERVICE

Yellow Cab Company

2603 East Fifth St. Montgomery, Alabama 36107
PHONE 262-5225



ACCOUNTING OFFICE
PHONE 262-1182

RECEIVED
NOV 18 1993
FCC - MAIL ROOM

November 12, 1993

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

Re: PR 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.

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,

W. A. Sayer
President
cc: All Commissioners

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List ABCDE

SPECK CAB CO., INC.
DBA **VETERANS TAXICAB CO.**

1501 HARRISON STREET • SAN FRANCISCO, CALIFORNIA 94103 • 552-1100

November 12, 1993

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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,


Mary Speck
President

cc: All Commissioners

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Veterans
Cab

Company

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NOV 18 1993

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FCC - MAIL ROOM

R.D. #6, Box 401 - Latrobe, PA 15650 - (412) 537-7704

November 10, 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 owner/operator of a taxicab system and a licensee of the Federal Communication Commission. We are located in southwestern Pennsylvania, about 40 miles east of Pittsburgh.

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.

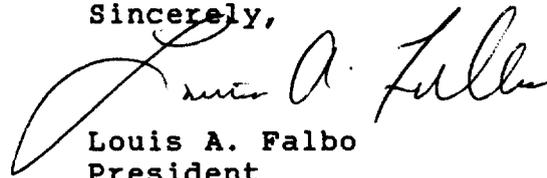
I want to express my strong opposition to such an idea. First of all I see no need for consolidation at all; the existing coordination system works and "if the system is not broke, don't fix it."

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 lease 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,



Louis A. Falbo
President

cc: All Commissioners



INTERNATIONAL
TAXICAB AND LIVERY
ASSOCIATION

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ORIGINAL
Liberty Communications, Inc.

Business Office

1524 Kenmore Avenue
Buffalo, NY 14216
FAX: 877-2900
877-7111

DOCKET FILE COPY ORIGINAL
Mary Yuhnke
Vice President

Bill Yuhnke
President

November 15, 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

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NOV 18 1993
FCC - MAIL ROOM

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 license 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 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,

William G. Yuhnke
William G. Yuhnke

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cc: Liberty Communications

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ORIGINAL

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GREATER HOUSTON Transportation Company

1406 Hays St., Houston, Texas 77009, (713) 224-4445

November 17, 1993

RECEIVED

NOV 18 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 utilize radio frequencies, any requirement that the two groups share frequencies is a prescription for interference and costly inefficiencies.

Yellow Cab Company purchased a computer dispatch system in 1989 at a cost of \$3,500,000 to meet the taxicab service requirements of the citizens of Houston and surrounding communities. Yellow Cab dispatched 2,400,000 requests for service in 1992, an amount equivalent to transporting the City of Houston's entire population of 1,655,900, 1.5 times a year.

Yellow Cab serves an area of 2,400 square miles and dispatches its service requests utilizing 4 frequencies for data and 1 for voice. At times Yellow Cab dispatches up to 600 or more service requests in one hour. Dispatching 600 trips in one hour equates to dispatching one trip every 6 seconds. There are hundreds of other transmissions necessary, both car to base and base to car, in order to be able to dispatch 600 trips in one hour. With up to 225 or more cabs utilizing each of its 4 data frequencies, and all of these cabs having access to its one voice frequency, Yellow Cab is making maximum use of its frequencies.

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Mr. William F. Caton
November 17, 1993
Page 2

Cab companies are unique in the volume of service requests dispatched and the number of transmissions necessary to accomplish the dispatch of these trips. In recent years more and more cab companies have converted to computer dispatching encompassing the expenditure of tens of millions of dollars for software, base station equipment, in cab computer terminals and new radios. Any action by the FCC which would remove the recognition of the unique status of taxicab frequencies could destroy the ability of taxicab companies to service the hundreds of millions of requests for taxicab service each year.

Computer dispatch systems data transmissions are set up so that the system automatically shuts down when a voice transmission is detected. If other voice users were assigned to taxicab frequencies, it would make it completely impossible for cab companies to dispatch the volume of trips necessary to meet service demands.

Most business frequencies operate as simplex frequencies, whereas cab companies because of their volume of transmissions utilize duplex frequencies. A business user on a simplex frequency may not even be aware of the interference they are causing a cab company on a duplex frequency. The shrimp fleets that operate in the Gulf of Mexico use radios with business frequencies. When they come into the vicinity of Houston waters, they use these frequencies like regular telephones causing interference on our frequencies. If land based operators had these frequencies, they would cause so much interference that thousands of taxicab customers would experience unnecessary service delays.

Another issue is driver safety. All computer dispatch systems have emergency buttons in the cab for the driver to alert the dispatch center if he or his passenger is in danger. If a driver hits his emergency button, but the transmission doesn't reach the dispatch center because of interference from a business user, a driver's or passenger's life could be placed in jeopardy.

The taxicab industry consists of over six thousand three hundred (6,300) taxicab fleets with over two hundred five thousand three hundred (205,300) vehicles, over fifty thousand (50,000) employees and over three hundred five thousand (305,000) drivers. The taxicab industry serves over two billion (2,000,000,000) passengers annually. One solution to protect and maintain a viable taxicab industry would be to exempt the 150 mhz taxicab frequencies from consolidation with business frequencies.

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

Mr. William F. Caton
November 17, 1993
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Very truly yours,

A handwritten signature in cursive script, appearing to read "Rudolph H. Bruhns".

Rudolph H. Bruhns
Executive Vice President

RHB/nac

cc: All Commissioners