

ORIGINAL

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DOCKET FILE COPY ORIGINAL

ABC TAXIS  
P.O. Box 1767  
Portland, Maine 04104  
(207) 772-8685

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NOV 22 1993

FCC - MAIL ROOM

November 17, 1993

Mr. William C. 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 General Manager of the largest taxicab company north of Boston and a licensee of your Commission.

I write regarding the suggestion that the Taxicab Radio Service in which I am licensee should be consolidated with Business Radio users or made part of a broad pool made up of diverse radio user groups.

I cannot express too strongly my opposition to this suggestion. The existing coordination system has worked excellently for any number of years, and I fail to see the necessity of any type of consolidation at this point.

It should be pointed out that any type of consolidation presents an unacceptable risk to taxi operating efficiency nationally. For our part here in the Northeast, I don't see how it would be possible to share our frequencies with other types of businesses. Like the police or fire departments, we are frequently involved in emergency situations, some of a life and death nature. In periods of inclement weather, it is vital that we have a private frequency inasmuch as the taxi is on the road long after the buses and limos have put their vehicles up.

I urge you to maintain the status quo in this matter. To do otherwise would not only be an affront to an industry that has serviced the Nation transportation needs since the days of the Revolution, (Yes, there were hackney carriages on the streets of Boston and Portland in 1776.) but in addition will most certainly jeopardize driver and passenger safety by substantially increasing radio interference.

Please find enclosed five copies of this letter for the

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List ABCDE

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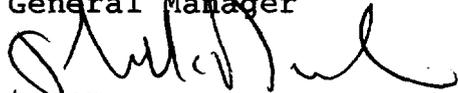
Mr. William F. Caton  
Page 2

Commissioners and the docket file.

My thanks for any consideration you may show toward the taxi industry in this matter.

Sincerely

Thomas McDonough  
General Manager



tam:m

cc:All Commissioners

cc:file

ORIGINAL

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Airport Limo  
432-8000

**C & E TRANSPORTATION  
OF BILOXI, INC.**

City Cab  
436-4655

Yellow Cab-Biloxi  
436-3788

Federal ID #64-0566040

337 Fairview Drive

Biloxi, Mississippi 39531

Yellow Cab-Gulfport  
863-1511

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FCC - MAIL ROOM

November 19, 1993

Mr. William F. Catom  
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 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 it ain't 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 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,



Earl Wildon Ross  
President

cc: All Commissioners

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245

ORIGINAL

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Cabs, Inc.

861-2323

**ZONE CAB CO.**

2358 WASHINGTON STREET  
DENVER, COLORADO 80205

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November 17, 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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FCC - MAIL ROOM

Re: PR Docket No. 92-235

Dear Mr. Caton:

Zone Cab is a licensee in the Taxicab Radio Service. We operate close to one hundred vehicles. We are very concerned about the proposed rules in the above docket. Radio communication is at the heart of our business. It would be impossible for us to operate if we had to share frequencies with other users. We believe that smaller operators than ourselves in the taxi industry would find it equally impossible to provide service to their customers if they were forced to share frequencies as well. In addition, the safety of cab drivers is at stake if taxi companies do not have an exclusive frequency.

Taxi companies provide a much needed service in communities all across the country. In many cases, cab service is the only transportation available to a large number of our citizens. Any rules which would contribute to increased interference or increased usage of taxicab frequencies would not only be disastrous to the industry, but would have an adverse impact on the public. We ask that you do not consolidate other radio users with the taxicab industry.

Finally, if the FCC does adopt narrowbanding rules, it is extremely important to Zone Cab that we be given enough lead time that the cost factor does not become prohibitive. We have made a considerable investment in our current equipment in the last two years. It would be a significant hardship for our company if we suddenly had to purchase all new equipment.

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

Sincerely yours,

CABS, INC., dba  
Zone Cab Company

*Jerome M. Ziegler*  
Jerome M. Ziegler  
General Manager

cc: All Commissioners

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FCC - MAIL ROOM

November 18, 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 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 it ain't 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 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,



Fred C. Nero  
President

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**Checker Cab Co., of Northern Illinois**

330 South Genesee Street  
Waukegan, Illinois 60079-8787  
(708) 662-2288

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FCC - MAIL ROOM

November 17, 1993

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

RE: PR Docket No. 92-235

Ladies and Gentlemen,

As owner of a mid-size fleet of paratransit vehicles, I am writing to emphasize the importance that my taxi company, and others like it, not be required to share radio channels with simplex (single-channel) Business Radio users.

My fleet of approximately fifty (50) paratransit vehicles operates twenty-four (24) hours a day, 365 days a year in Lake County Illinois. In this suburban Chicago area, where public transportation is limited or, in many cases, unavailable, and where a majority of the population is spread out over a very large and sparsely populated area, we are relied upon for prompt transportation service.

It is impossible for an active user, such as my taxi company, to share its radio channels with ordinary Business Radio users. Not only will the resulting interference jeopardize the efficiency of my business to service the public, but the safety of our drivers will be impacted by substantially increasing the interference on each channel.

I implore you to keep our radio channels separate from the single-channel Business Radio users. If you must consider consolidating private radio services, I would request that we be grouped with other Land Transportation users.

I have enclosed five copies of this letter for the Commissioners and the docket file.

Sincerely,

*Pervaiz R. Karim*  
Pervaiz R. Karim  
President

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cc: All Commissioners

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WRK D/B/A YELLOW CAB  
408 SO. 9th.  
WACO , TEXAS 76706

November 18, 1993

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

Re: PR Docket No. 92-235

Ladies and Gentlemen:

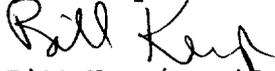
I am writing this letter to stress how important it is that my taxi company and others like it not be required to share channels with incompatible users.

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,



Bill Kemp/President

cc: All Commissioners

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**DAYTON YELLOW CAB CO.**

700 EAST FOURTH STREET

DAYTON, OHIO 45402

November 19, 1993

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NOV 22 1993

FCC - MAIL ROOM

Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

RE: P R Docket No 92-235

Ladies and Gentlemen:

The purpose of this letter is to emphasize the importance that Dayton Yellow Cab not be required to share channels with incompatible users.

There is no way that an active company like ours can share its paired channels with Simplex (Single Channel) business radio users. The efficiency of our business will not only be jeopardized, but so will the safety of our drivers be affected by increasing the chance of radio interference, and missed or delayed calls.

If it is necessary that private radio service be consolidated, let us be grouped with other land transportation users such as railroads and motor carriers.

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

Sincerely,

  
Don O Nushawg  
President

DON/jac  
Encl

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List A B C D E

# **METRO CAB, Inc.**

5090 Central Highway • Pennsauken, New Jersey 08109 • 609-547-1076 • FAX 609-662-7979

**METRO SERVICENTER**  
AUTO REPAIR • TOWING  
546-8880

**METRO'S**  
CASINO CONNECTION  
428-1500

**RECEIVED**  
METRO'S RAPID ROVER  
AIRPORT SHUTTLE  
NOV 22 1993

November 15, 1993 **FCC - MAIL ROOM**

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

RE: PR Docket No. 92-235

Ladies and Gentlemen of the Commission:

I am writing this letter to let you know the importance of not being required to share radio channels with regular business radio users. This not only applies to our company, but also other taxi and transportation companies like ours.

It should be noted that a sharing of the air waves will not only harm the efficiency of our business but would definitely jeopardize the safety of my drivers and our passengers. There is no way that an active taxi business can share its paired channels with simplex (single channel) business radio users. The resulting interference could quite possibly "knock us out of the box", and if it came to an emergency call it could result in catastrophic fashion.

If consolidation of private radio services is really necessary, at least make sure that land transportation users are grouped together. We are aware of the nature of each others business and can extend the common courtesy needed if an emergency arises in the course of our normal business day. Keep us together if you really must consolidate.

Sincerely,



Marshall A. LaBar  
Fleet Manager  
Metro Cab, Inc.

cc: All Commissioners

MAL/rh

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List A B C D E

# SUBURBAN.

TAXI CORPORATION

3315 North Second Street  
 Minneapolis, Minnesota 55412  
 Tel. 612-588-0000  
 Fax. 612-588-0339

November 16, 1993

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NOV 22 1993

FCC - MAIL ROOM

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

RE: PR Docket Number 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 the 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, 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,



Michael Waldmann  
 General Manager

cc: All Commissioners

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