

EX PARTE OR LATE FILED

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May 26, 1998

*BY HAND DELIVERY*

Ms. Magalie R. Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

**Re: Ex Parte  
PR Docket No. 92-235**

DUPLICATE COPY ORIGINAL

MAY 26 1998

Dear Ms. Salas:

This is to provide notice that on May 22, 1998, AAA sent the enclosed letter to the FCC Chairman and Commissioners Harold Furchtgott-Roth, Susan Ness, Michael Powell, and Gloria Tristani. The letter discusses AAA's pending Petition for Reconsideration in the above-referenced matter.

An original and one copy of this filing is being provided. Please do not hesitate to call should you have any questions regarding this filing.

Sincerely,

Michele C. Farquhar

Enclosure

No. of Copies rec'd 0+1  
List A B C D E

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Robert L. Darbelnet  
President and  
Chief Executive Officer

1000 AAA Drive  
Heathrow, FL 32746-5063  
407/444-7111  
Fax 407/444-7120

May 22, 1998

The Honorable William E. Kennard  
Chairman  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Chairman Kennard:

I am writing to reinforce AAA's concern over the Federal Communications Commission's Second Report and Order of February 20, 1997, which placed the Automobile Emergency Radio Service (AERS) frequencies in the newly created Industrial/Business (I/B) pool.

As AAA's FCC filings demonstrate, placement of the auto emergency frequencies in the I/B pool, without any coordination protection, is and will continue to be extremely detrimental to AAA's provision of emergency road service. AAA has proposed a very simple solution that will help ensure roadside emergencies continue to be attended to without having any adverse effect on private radio spectrum allocation and use.

In its petition for reconsideration, AAA has proposed that the auto emergency frequencies be given the same quasi-public safety treatment as railroads, petroleum, and utilities, whereby other coordinators would be required to request the use of a frequency before assigning it to a non-auto emergency use. The auto emergency frequency coordinator could then ensure the assignment would not cause interference with existing emergency uses.

AAA responds to more than 29 million calls per year. Thirty percent (8 million) of those calls are true emergencies presenting danger to life or property: a breakdown on the freeway, being locked out or stranded in a dangerous part of town or in a deserted area, clearing accidents from congested highways and streets. Clear channels are required to dispatch these emergency calls. If the auto emergency frequencies are subject to sudden and unanticipated interference from a new assignment, AAA can't respond to roadway emergencies quickly and efficiently. The number of auto emergency frequencies that encounter interference from other users will increase substantially as frequency coordinators become more familiar with the new I/B system and begin to make an increasing number of random assignments.

Granting the automobile emergency frequencies the same "quasi-public safety" status as railroads, petroleum, and utilities will not deprive any entity of the use of additional spectrum. It simply will recognize that automobile emergencies are a safety concern so that the frequencies used to dispatch

The Honorable William E. Kennard

May 22, 1998

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emergency roadside service will not be assigned if they will cause interference to the incumbent user.

Enclosed is new information AAA released earlier this week, which we believe makes a compelling case for the relief we seek. In particular, we have cited five specific reasons AAA's petition should be granted: (1) time is critical to emergency road service functions; (2) increasing interference and coordination problems have occurred under the current system; (3) emergency road service meets all the "quasi-public safety" characteristics cited by the FCC for railroads, power, and petroleum companies; (4) there will be a minimal impact on other radio frequency assignments; and (5) AAA emergency road service has already been recognized as a vital public safety service by Congress and many public safety entities.

AAA appreciates your consideration of these views and respectfully requests that the FCC grant AAA's petition for reconsideration.

Sincerely,



Robert L. Darbelnet

RLD:iv

c: Mr. Ari Fitzgerald

Enclosures



Robert L. Darbelnet  
President and  
Chief Executive Officer

1000 AAA Drive  
Heathrow, FL 32746-5063  
407/444-7111  
Fax 407/444-7120

May 22, 1998

The Honorable Harold W. Furchtgott-Roth  
Commissioner  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Commissioner Furchtgott-Roth:

I am writing to reinforce AAA's concern over the Federal Communications Commission's Second Report and Order of February 20, 1997, which placed the Automobile Emergency Radio Service (AERS) frequencies in the newly created Industrial/Business (I/B) pool.

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Sincerely,



Robert L. Darbelnet

RLD:lv

c: Mr. Paul Misener

Enclosures



Robert L. Darbelnet  
President and  
Chief Executive Officer

1000 AAA Drive  
Heathrow, FL 32716-5063  
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Fax 407/444-7120

May 22, 1998

The Honorable Susan Ness  
Commissioner  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

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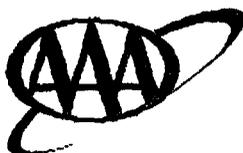
Sincerely,

  
Robert L. Darbelnet

RLD:lv

c: Mr. David R. Siddall

Enclosures



Robert L. Darbeinet  
President and  
Chief Executive Officer

1000 AAA Drive  
Heathrow, FL 32746-5063  
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Fax 407/444-7120

May 22, 1998

The Honorable Michael K. Powell  
Commissioner  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

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Sincerely,

  
Robert L. Darbelnet

RLD:iv

c: Mr. Peter Tenhula

Enclosures



Robert L. Darbelnet  
President and  
Chief Executive Officer

1000 AAA Drive  
Heathrow, FL 32746-5063  
407/444-7111  
Fax 407/444-7120

May 22, 1998

The Honorable Gloria Tristani  
Commissioner  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Commissioner Tristani:

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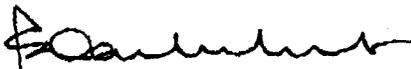
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Sincerely,



Robert L. Darbelnet

RLD:lv

c: Ms. Karen Gulick

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