



Hoosier Motor Club

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June 3, 1998

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

Dear Commissioner Ness:

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.

The AAA Hoosier Motor Club, based in Indianapolis, responded to well over 100,000 requests for Emergency Road Service in 1997 alone. Of those, 41,000 requests were from consumers stranded away from their home or business, often in a dangerous situation. The AAA Hoosier Motor Club has a membership base of 340,000 members and is responsible for two-thirds of the geographical territory of the State of Indiana.

AAA nationally 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

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

In closing, there are 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,



Larry Barnett
Vice President, AAA Hoosier Motor Club

Enclosures