

## Miller Communications, Inc.

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July 15, 1998

Ms. Magalie Roman Salas  
Secretary, FCC  
Room 222  
1919 M Street NW  
Washington DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
ALB

RE: LMCC PETITION FOR RULEMAKING (RM-9267)

I am writing in support of the Petition for Rule Making filed by the LMCC seeking new spectrum allocations for private wireless users. We appreciate the FCC's prompt petition for public comments.

I founded Miller Communications in the early seventies with a staff of three. We now employ 25 people. Our engineers and technicians are design, install and maintain the two-way radio systems for the emergency response (fire, police, hazmat) in five surrounding counties.

The large chemical plants up and down the Mid-Ohio Valley rely on two-way radio and emergency alert and paging systems to alert and protect their workforce and the surrounding community in the event of a chemical leak or other disaster. Local hospitals, doctors, and other health care providers depend on two-way radios and our paging systems for information and direction. Two-way radio is used by many businesses and agencies in addition to cellular or PCS systems. In an emergency situation, radio communications is generally quicker, more accessible, and more reliable than cellular. In the mountains of West Virginia there are an awful lot of places where cellular can not provide coverage.

Since the inception of our company, the need for spectrum as a communication medium by our client base has been a major concern. The need for additional spectrum is felt by our client base and our firm weekly. A review of the weekly FCC Summary shows thousands of applications, clearly indicating the need for additional spectrum as well as the need to retain the existing channels allocated to the business, industrial, and public service sector.

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Several years ago, in an effort to alleviate the crowded 450 spectrum, we applied to the FCC for 800 MHz channels. These channels were not acted upon in a timely manner. The channels were lobbied for by a major corporation with a plan, granted, and frozen. The resultant effects on our firm are:

- ♦ We have invested in a backbone system which is going nowhere.
- ♦ The freeze permits time to expire, allowing new technology to be put into place which will eventually jeopardize our firm's financial stability.
- ♦ We have lost potential customer base and revenue due to not having additional spectrum for which to sell radio equipment and draw a monthly recurring income.

Congested channels are trying the patience of our customers. One example: a construction company employee cut his hand severely. The owner used his radio on a repeater system to instruct his office to get medical assistance on the way. Another user on the system overrode his transmissions, jamming the conversation. The company owner had to rush his employee to the emergency room because he could not get his message through on the crowded channel.

Another case and point: our private carrier paging system. A local chemical plant Hazmat Team is dispatched by our pagers. We monitor the channel according to FCC rules and regulations. A co-channel user from another city, was running his channel wide open in our community and jamming our traffic. This resulted in a slower response time for the chemical emergency.

The bottom line is, if we are going to continue to provide a wireless communications service to our community, there is a definite need for more channels which are relatively clear of traffic.

We urge that the FCC review the spectrum issue that faces the commissioners as a responsible body and expeditiously establish rulemaking procedures which will allow the valuable spectrum to be utilized by the masses of the United States for the purpose for which our governing forefathers intended--that is to be used by "THE PUBLIC"!

Respectfully submitted



Timothy T. Miller

President and Owner

MILLER COMMUNICATIONS



# South River Electric Membership Corporation

Power and Progress  
Through Cooperation

July 14, 1998

Ms. Magalie Roman Salas  
Secretary, FCC  
Room 222  
1919 M Street, NW  
Washington, DC 20554

Subject: LMCC Petition (RM-9267)

Dear Ms. Salas:

I would like to express my strong support for the efforts of the Land Mobile Communications Council to acquire more spectrum for private land mobile systems. While South River EMC currently uses a public trunked radio system for most of our voice communications, we use private systems for load management and supervisory control and data acquisition communications. We also would like to keep our options open for private voice systems in the future.

Based on the benefits that our company receives, private radio is clearly a major asset to this country. Reducing our ability to choose a private wireless communications solution could disrupt our business plans and would not serve the long-term interest of the United States.

Thank you for considering this letter.

Sincerely,  
SOUTH RIVER ELECTRIC MEMBERSHIP CORPORATION

Buddy G. Creed  
Executive Vice-President  
& General Manager

BGC/km

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