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FEDERAL COMMUNICATIONS COMMISSION
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File No. PP-23

In the Matter of)
Request by)
PRONET INC.)
For Grant of a Pioneer's)
Preference for its Electronic)
Tracking Service)

To: The Commission

REQUEST FOR GRANT OF PIONEER'S PREFERENCE

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July 30, 1991

SUMMARY

ProNet Inc.'s ("ProNet") wholly-owned subsidiary, Electronic Tracking Systems, Inc. ("Tracking Systems"), operates state-of-the-art Electronic Tracking Systems ("ETS") under experimental authority in twelve (12) metropolitan areas, including Los Angeles, San Francisco and Dallas. ETS assists local, state and federal law enforcement agencies with criminal tracking operations.

A mini "tag" transmitter is secretly attached to bundles of currency, jewelry or other valuables. When a "tagged" valuable is stolen, the transmitter is activated. Equipped with various receiving devices, law enforcement authorities are able to track the criminal.

During its 18 years of experimental operation, ProNet's ETS has been an unqualified success. Law enforcement authorities are able to apprehend perpetrators quickly and recover the stolen goods. Capture and corresponding conviction rates have increased. Incidence of robbery in markets where ETS is deployed has decreased significantly. Such reduction in crime results in a much lower risk to human safety.

For example, as recently as on July 26, 1991, two men robbed \$20,000.00 from a Dallas bank. Some of the stolen currency was "tagged" with an ETS transmitter. Within seven minutes after the robbery, the two perpetrators were caught. All the stolen currency was recovered.

In this age of heightened worldwide concern for safety to person and property, there is an increasing need for sophisticated

security technologies. Establishment of ETS as a permanent service would contribute to satisfying this need. Making ETS a permanent service would stimulate its expansion domestically. With that opportunity to develop the ETS system and its technology assured, expansion into overseas markets would be facilitated, thereby enhancing the competitiveness of the U.S. telecommunications industry worldwide.

Continued development and expanded implementation of this clearly beneficial service nevertheless are threatened. There is no permanent spectrum allocated for ETS. Without such certainty, despite ETS' unparalleled success at decreasing and deterring crime, law enforcement authorities, financial institutions and other merchants are reluctant to invest their resources and support its availability.

ProNet now seeks to remedy this situation. In a Petition for Rule Making ("Petition") filed concurrently with this Request, ProNet proposes amendment of Part 90 of the Commission's Rules to establish ETS as a permanent service under the Business Radio Service. ProNet also proposes allocation of three (3) channels in the 216-220 MHz band for ETS. With minor exceptions, these are the only rule changes needed to establish ETS as a permanent service.

These proposed changes are a small price to pay for promoting a radio service proven to reduce crime to property and person. Indeed, the Commission is mandated under the Communications Act of 1934, as amended, and is required by Congress to take action appropriate to effectuate such promotion of safety. Accordingly,

the Commission must adopt the rules proposed in ProNet's Petition.

ProNet's ETS is a prime candidate for grant of a Pioneer's Preference. ETS clearly is an innovative proposal. It maximizes the capabilities and possibilities of radio tracking technology for protection of public safety and private property. ETS adds functionality and presents different uses of the spectrum because it provides unique capabilities for tracking at a much lower power level (i.e., less than 120 milliwatts as opposed to 1-2 watts required by other tracking systems). Its demonstrated success in aiding law enforcement officials to apprehend criminals and stolen goods quickly and to deter crime results in substantial cost savings for public and private sector security efforts and in decreased costs associated with unrecovered stolen goods. ETS uses the spectrum efficiently because it requires only three (3) 8 KHz channels and it operates at such low power (less than 120 milliwatts) that spectrum sharing is facilitated.

In adopting rules for grant of a Pioneer's Preference, the Commission concluded that it was desirable to reward parties for undertaking the efforts and risks associated with the development of new radio services and technologies. Moreover, the Commission concluded that a Pioneer's Preference would make it less difficult and expensive for innovators to survive its allocation and licensing processes. Given Tracking Systems' history of providing ETS on an experimental basis and the proven benefits gained from this technology, grant of the Pioneer's Preference requested herein clearly is warranted.

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 To: The Commission

REQUEST FOR GRANT OF PIONEER'S PREFERENCE

Pursuant to Section 1.402 of the Commission's Rules,¹ ProNet Inc. ("ProNet"), by its attorney, hereby requests that the Commission grant a Pioneer's Preference for its Electronic Tracking System ("ETS"). As more fully described herein, ProNet, and its wholly-owned subsidiary, Electronic Tracking Systems, Inc. ("Tracking Systems"), have developed and operated an innovative, unique state-of-the-art security tracking system.²

¹ 47 C.F.R. Section 1.402 (1991).

² Concurrently with filing this Request for Pioneer's Preference, ProNet has filed a Petition for Rule Making to amend the Commission's Rules to allocate spectrum for permanent provision of ETS and to amend the Commission's Rules to authorize ETS on a permanent basis under the Business Radio Service.

I. INTRODUCTION

ETS is provided, under Experimental Licenses held by Tracking Systems,³ to several local police departments, the Federal Bureau of Investigation ("FBI"), financial institutions (e.g., banks), and merchants (e.g., jewelers, retail stores). Tracking Systems assists these law enforcement agencies with criminal tracking operations in numerous metropolitan areas throughout the country.

Tracking Systems utilizes sub-miniature transmitters "tags," an area-wide monitoring ("AWM") system, and an array of direction-finding tracking receivers to provide its ETS. The sub-miniature "tag" transmitters are easily hidden in a stack of currency or on other valuable merchandise. These transmitters broadcast a silent signal when moved, alerting the local law enforcement agencies of a robbery. To detect this signal and locate the stolen goods, the ETS monitoring system consists of several receivers distributed throughout the service area.

One set of receivers (i.e., "Remote Detectors") are located on tops of buildings or on other high structures. These receivers are connected by phone lines to a central dispatch computer system, which notifies the local police of criminal activity. The police dispatcher tracks the movement of the stolen property on a computer map and communicates such information directly to the police officers.

³ See Exhibit 1. Currently, ETS is provided by Tracking Systems in Anchorage, Austin, Dallas, Houston, Las Vegas, Los Angeles, Phoenix, Portland, Reno, Sacramento, San Francisco, and Shreveport.

In addition, police officers independently are capable of tracking the stolen goods. A second set of receivers are located in police cars or helicopters (i.e., "Vehicle Trackers"). Other tracking receivers (i.e., "Hand Held Trackers and "Pocket Detectors") are capable of being hand-carried. Police officers are able to commence pursuit promptly with the aid of patrol-car dash-mounted trackers which "read" the signal of the tag attached to the stolen property. These mobile trackers display distance and direction for ground and air pursuit. Tag signals locate the perpetrators in a vehicle, on foot, or inside a building.

ETS clearly serves the public interest. In those cities where ETS has been operated under Experimental License, the results have been dramatic. Crime rates have been reduced significantly. Conviction rates and the amount of stolen property recovered have been increased significantly.⁴

In San Francisco, the incidence of bank robberies was increasing at an annual rate of 65% before implementation of ETS. Since the introduction of ETS in San Francisco, bank robberies have been reduced by 80%. Similarly, in Las Vegas, the bank robbery rate was lowered by 67% in the first nine (9) months since implementation of ETS.

In addition to the obvious benefit of locating suspects, the ETS system enables arrests to be turned into convictions. Because the system allows authorities to track down suspected criminals

⁴ See Exhibit 2 for a detailed presentation of the documented impact from implementation of ETS in all the markets where it is operated pursuant to Experimental License.

within minutes after a crime has been committed, perpetrators are often apprehended with the stolen property, weapons, disguises, and other contraband still in hand. A conviction has resulted in 100% of the cases involving the ETS system in which a criminal was apprehended by the FBI or local law enforcement authorities. Nationwide conviction rates without the ETS system are significantly lower.⁵

The following testimonials about ETS are the best evidence that grant of a pioneer's preference is in the public interest:⁶

The City of Dallas Chief of Police

We became involved with ETS and Electronic Tracking System in August 1987 and found it to be a valuable tool in law enforcement. Specifically, our organization has had experience with ETS in the area of financial institution robberies, where the Electronic Tracking System has resulted in the apprehension and subsequent conviction of the felony robbery suspect, under circumstances that typically would result in the robber getting away. The Electronic Tracking System also allows the user police departments the advantage of making the arrest away from the location of the offense. This has led to increased personal safety for financial institution customers and employees, police officers, and the citizens of our community.

The City of Houston Chief of Police

ProNet Tracking Systems has proved its effectiveness several times (most recently this month). The system is clearly a

⁵ Apprehension and conviction rates for bank robberies with and without the ETS system highlights its remarkable success. The capture rate for bank robberies in which an ETS system is employed is 85%, resulting in a 100% conviction rate of those who are apprehended. This compares to a capture rate of only 25% and a resultant conviction rate of only 50% for bank robberies where ETS was not used. Thus, authorities using the ETS system have been able to obtain a conviction for 85% of the bank robberies in their area without the use of plea bargaining. Law enforcement officials without ETS tracking recorded convictions in only 12% of the cases.

⁶ See Exhibit 2 for the full text of these testimonials.

sound and effective application of communications technology supporting public safety, law enforcement and private sector interests. Through this correspondence, the Houston Police Department solicits [the Commission's] favorable consideration in licensing electronic tracking systems frequencies for public safety/law enforcement applications.

City of Reno Chief of Police

The Reno Police Department entered into a contract with ProNet Tracking Systems in 1988 to provide equipment and support for a[n] electronic tracking system. Since that time, our agency has enjoyed a substantial increase in clearance rates for bank robberies, primarily based on the success of the system. We find the equipment has been reliable and of consistent use to uniformed police officers in tracking and capturing bank robbers and criminals involved in other types of robbery crimes.

Vice President and Senior Deputy Director, Bank of America.

We wish to express our support of the Tracking Systems [ETS].... Bank of America began using the [ETS] robbery deterrent devices in San Francisco in 1983, and has expanded use of the devices in Northern and Southern California communities where it has become available. We have found the [ETS] devices to be a highly effective robbery deterrent. The number of our Bank robberies and robbery losses have been significantly reduced in those areas where the [ETS] devices are in use. Use of the [ETS] devices has also resulted in an increase in the number of robbers that have been arrested and convicted, that typically would not have been apprehended. We feel the [ETS] devices are the most effective loss prevention tool currently available to safeguard the Bank's assets, customers and employees.

Director of Loss Prevention, Best Products.

We became involved with ETS and the Electronic System in 1989 and have found it to be a valuable tool in critical law enforcement areas. Specifically, our organization has had experience with ETS in the area of armed robberies of our jewelry departments where the Electronic Tracking System has resulted in the apprehension of the suspects and the recovery of our merchandise under circumstances that typically would have resulted in the robbers getting away. Over time, we have experienced an overall decline in our robbery rate where we employ the system which has led to increased personal safety for our employees and customers.

Efforts by innovators of publicly beneficial radio technologies, such as ProNet's Tracking Systems, to implement their services, chronically have been frustrated by the Commission's licensing and allocation processes. To date, Tracking Systems has been limited to providing its ETS only on an experimental basis. It operates ETS on the 219.960 MHz band, but no spectrum has been allocated for ETS on a permanent basis. The Commission decided against any set-aside of narrowband channels for ETS as part of its 220 MHz allocation, despite overwhelming support for such action by countless local police departments, the FBI, financial institutions, and merchants.⁷

In considering and finally adopting the Pioneer's Preference, the Commission recognized this problem:

pioneer's preference appears desirable for parties undertaking the efforts and risks associated with the development of new radio services and technologies. The Commission expressed concern that the current allocation and licensing processes may make it more difficult and expensive to bring new radio services to the market and that these processes could have an adverse effect on the development and implementation of new services. It also observed that innovators of new services must spend a considerable amount of time and money to develop new services and that several parties have recently indicated their hesitancy to make such investments absent the assurance that they would be able

⁷ See Amendment of Part 90 of the Commission's Rules to Provide for the Use of the 220-222 MHz Band by the Private Land Mobile Radio Services, 6 FCC Rcd 2356, 2360 (1991) (the "220 MHz Order").

to provide the service and, thus, recoup their investments.⁸

ProNet deserves this reward for its Tracking Systems. Under its Experimental Licenses, Tracking Systems has a proven track record in providing an innovative technology which assists police and federal authorities in the fight against serious crime. The potential law enforcement applications of this system in a wide range of criminal operations is virtually limitless. Based on the Tracking Systems record, it is clear that grant of a Pioneer's Preference for licensed operation of this sophisticated tracking technology will facilitate crime prevention significantly and thus will serve the public interest.

II. STANDARDS FOR GRANT OF PIONEER'S PREFERENCE

In the Report and Order wherein the Pioneer's Preference was established, the Commission set forth the overall standard for its grant:

The Commission, in its discretion, will award a pioneer's preference to an entity that demonstrates that it (or its predecessor-in-interest) has developed an innovative proposal that leads to the establishment of a service not currently provided or a substantial enhancement of an existing service, provided, that the rules adopted for the new or existing service are a reasonable outgrowth of the proposal and lend themselves to the grant of a preference and a license to the pioneer.⁹

An "innovative proposal" means that the party requesting the preference "brought out the capabilities or possibilities of the

⁸ Pioneer's Preference, 69 Rad. Reg. (P&F) 2d 141, 143 (1991).

⁹ Id. at 149.

technology or service or has brought them to a more advanced or effective state."¹⁰ Several criteria were adopted to determine if the proposal is "innovative." These criteria include:

an added functionality, a different use of the spectrum than previously available, or a change in the operating or technical characteristics of a service, any of which involve a substantial change from that which existed prior to the time the preference is requested. Further, technologies that yield efficiencies in spectrum use, speed or quality of information transfer, or spectrum sharing, or which significantly reduce costs to the public, will be given careful consideration.¹¹

III. PRONET'S ETS SATISFIES THE CRITERIA FOR GRANT OF A PIONEER'S PREFERENCE

The Commission will grant a Pioneer's Preference to an entity that develops an innovative proposal for establishment of a new, licensable service.¹² As demonstrated below, ProNet's ETS satisfies these requirements.

A. How ETS Works

ProNet and its subsidiary, Tracking Systems, have forged an effective, unique partnership for their ETS among their own electronic security experts, local and national law enforcement authorities, and various private sector customers, including numerous financial institutions and jewelry stores. The following recent examples highlight ETS' dramatic success:

¹⁰ Id.

¹¹ Id.

¹² Id. at 147.

* On July 26, 1991, two men robbed \$20,000.00 from a Dallas bank. Some of the stolen currency was "tagged" with an ETS transmitter. Within seven minutes after the robbery, the two perpetrators were caught. All the stolen currency was recovered.

* In 1990, four (4) banks in Texas with ETS were robbed of approximately \$30,000.00. All the robbers were captured. All the stolen monies were recovered.

* In a Dallas bank, on the same day the ETS installation had been completed, a robbery occurred. The perpetrator took the money, which was "tagged" with the ETS transmitter, and met with an accomplice. A police officer, with an ETS tracking device, was nearby. This officer followed the perpetrators for one minute and then apprehended both criminals with the stolen money.

* In Las Vegas, a bank robber hired a chauffeured limousine to carry him to the bank and, according to his plans, to a mountain ski resort outside town. When ETS-equipped chase patrol vehicles were delayed by a traffic incident, the ETS-equipped police helicopter landed in front of the limousine, forcing it from the road. The robber then was arrested by the helicopter co-pilot police officer.

* Recently, in Austin, Texas, a bank robber was foiled by the local ETS force seven minutes into his get-away with over \$120,000. The bank that was robbed had just opened for business that day. Without the ETS recovery, it likely would have folded that same day.

* In Anchorage, Alaska, robbers are much more violent. Their guns have larger bores and they act much more like the early days of the "Wild West." A recent bank robber shot three times into the ceiling to get the tellers' attention at the start of the robbery. An ETS capture several minutes later assured that no further shots would be fired by that robber for the next 25 years.

* In June of this year, in Southern California, three masked men entered a jewelry store. The first displayed a shotgun and

ordered the customers and clerks to stand still or hit the floor. The other two, armed with baseball bats and garbage bags, walked down either side of the store smashing out the tops of the display counters. Meeting in the rear, they turned and took most all the jewelry from the case. In less than two minutes, the robbers had cleaned out the store display stock of expensive jewelry, worth approximately \$500,000. However, seven minutes later, officers tracking ETS signals were able to apprehend the criminals and recover all the stolen goods.¹³

1. The ETS Network

Tracking Systems operates under Experimental License in each of its 12 markets. It enters into agreements with the local government to work with and lease tracking equipment to law enforcement authorities. Tracking Systems also enters into agreements with local businesses for security protection services.

Mini radio frequency beacons ("tags") are attached clandestinely to currency, narcotics, jewelry or other commonly stolen goods. For example, an undetectable hole is cut out in the middle of a bundle of currency.¹⁴ The tag is then inserted into this hole in the bundle and then is covered with more currency. The "tagged" bundle is placed among other benign bundles of currency. These bundles are earmarked for use in robbery attempts. The robber unknowingly is handed several bundles of currency, including the "tagged" bundle. Movement of the transmitter triggers the radio signal.

¹³ See Exhibit 3 for graphic descriptions of the ETS System.

¹⁴ Tracking Systems has been authorized to make this hole by the U.S. Treasury Department.

Tracking Systems deploys an AWM system to control tracking of the stolen goods. This system uses a PC computer display system at the dispatch headquarters of the local law enforcement agency. A wide-area mapping system displays the processed areas of tag activity in a dynamic fashion indicating the tag location and its direction of travel.

This display system uses radio receiver Remote Detectors located on various structures throughout the area to detect the location of the moving tags. These receivers are placed in coverage patterns carefully selected to monitor the areas of the city in topographically overlapping patterns that will best indicate the effects of the movement. Typically, these data are relayed from the Remote Detectors to the AWM via local leased phone lines.

Simultaneous overlapping coverage of the entire area is provided by actual tag tracking receivers located in police patrol vehicles in each patrol beat. These single site location tracking units have a range of approximately one mile. Individually, they are able to track a tag to its location independent of other receivers through use of a homing capability indicating both range and azimuthal direction to the target tag.

Police aircraft and helicopter mounted vehicle trackers enable monitoring and pursuit from the air over even longer ranges and ensure the continuous coverage, speed, and maneuverability required to assure the felon is not lost. Further, these airborne devices

allow police to stand-off and maneuver the felon into an area where his capture is less dangerous to the public.

Two sets of hand carried trackers complement the AWM and Vehicle Trackers. The Pocket Detector, carried with each of the Vehicle Trackers, allows close-in tracking of tags once they have been taken into constrictive avenues inaccessible to Vehicle Trackers. In simpler cases, the Pocket Detector can be used to find the tag and identify the felon directly. In more complex cases, when the tag is taken into a shopping mall, into a high-rise building, under ground, or into an apartment complex, the Hand Held Tracker is used to direct the available array of Pocket Detector equipped officers to within their range.

As the licensee, Tracking Systems is directly responsible for the proper installation, maintenance, and operation of each transmitter for which it is licensed and for all associated equipment. Pursuant to its agreement with the city and with its customers, Tracking Systems exercises such direction and control as is necessary to assure that all authorized facilities are employed only for permissible purposes, in a permissible manner, by persons with authority to use and operate such equipment, and in compliance with all applicable provisions of the Act and with all applicable Commission rules.

2. Uses for ETS

Currently, ETS is used for three primary tracking functions: (1) felony monitoring; (2) undercover monitoring and training; and (3) misdemeanor, commercial, and low-priority felony monitoring.

Felony monitoring -- Felony monitoring principally involves tracking bank robberies. Financial institutions are supplied currency bundles equipped with ETS tags.

Undercover and training applications -- Undercover and training applications include individual group, intra-jurisdictional, trans-jurisdictional and inter-jurisdictional training of officers. This includes training and follow-up on how to operate the ETS equipment and on tactics for effective tracking procedures.

Undercover applications include everything from police Internal Affairs Division ("IAD") uses to narcotics and other legal undercover operations. These operations might vary from court ordered tracking of organized crime members, suspects in a legal encounter, or repeat offenders.¹⁵

Misdemeanors -- Within the purview of the police monitored AWM system, other crimes of a lesser nature are included. Such crimes usually do not include the imminent possibility of violent action that could overflow into the public. This is a wide ranging set of crimes, that include everything from a misdemeanor like shoplifting, to high-value cargo theft, to vehicle theft, to

¹⁵ It should be noted that undercover tracking/trailing does not mix with the felony monitoring described above. Accordingly, separate frequencies are needed for felony monitoring and for undercover operations. For example, IAD tracking of a patrol officer suspected of narcotics trafficking would not be effective, much less prudent, if the suspect officer and the IAD officer were using the same frequency. Digital tone or digital coding would not avoid this problem as one would de-sense the other. It is also possible that one officer's use of this channel would alert the other and disclose the undercover agent.

limited area emergency medical response, to key personnel protection. This category of usage for ETS would require both type and unique ID coding to assure control of false alarms and other pertinent control issues.

Potential applications for ETS are virtually unlimited. Tags can be secreted on almost any valuable, property or person. Vehicles, illegal drugs, museum articles, personal clothing and individuals are some examples of what can be protected. High risk robbery targets, such as homes, jewelers, pharmacies, grocery stores, fast-food restaurants, and other businesses that carry large amounts of cash or valuables, are prime candidates for using ETS.

B. ETS is an "innovative proposal"

ProNet's proposed ETS presents numerous attributes that the Commission declared compel grant of a Pioneer's Preference. These attributes include: (1) added functionality and a different use of the spectrum; (2) significant cost reductions; and (3) efficiencies in spectrum use, speed or quality of information transfer, and spectrum sharing.¹⁶

1. ETS would offer "added functionality" and different spectrum use

ETS is a unique application of low-power radiolocation technology. ProNet and Tracking Systems have developed a network consisting of mini "tag" transmitters capable of being attached secretly to valuable goods and distributed fixed and mobile

¹⁶ Pioneer's Preference, 69 Rad. Reg. (P&F) 2d at 149.

receivers. They have taken these basic telemetering components and advanced their applications into an effective and unique crime fighting tool.

ETS operates at very low power as it does not exceed 120 milliwatts ERP. Similar tracking systems operate at much higher power levels of 1-2 watts ERP. Tracking Systems' capability to operate at such a low power ensures minimal impact on other spectrum users while maintaining effective and reliable communications.

Tracking Systems' ETS provides added functionality with its advanced ability to home in accurately on the "tagged" and stolen valuables. ETS' capacity for direction finding and ground-to-ground tracking are unavailable on other tracking systems.

2. ETS would reduce costs significantly

ETS reduces and deters crime. This success lowers costs for public and private sector security efforts. These lowered costs permit re-allocation of resources by law enforcement agencies to other areas of crime fighting and community development.

There are several related benefits from ETS that involve cost savings. Apprehension of criminals with the stolen goods in their custody yields faster trials, higher conviction rates, and ultimately less crowded court dockets. Decreased bank robberies saves financial institutions, including the troubled Savings and Loans, from significant losses due to robberies and from unnecessary security costs.

3. ETS yields efficiencies in spectrum use and facilitates spectrum sharing

ETS maximizes efficient spectrum use and facilitates spectrum sharing. This is accomplished by operating at such a low ERP that it can operate on a secondary basis to other services in the 216-220 MHz band and that it will not cause harmful interference to licensees in adjacent bands.

Based upon its 18 years operational experience providing ETS in the 216-220 MHz band (i.e., at 219.96 MHz), Tracking Systems has determined that it is the optimum band for this service. At lower frequencies, beginning at about 200 MHz, the spacing needs of the tracking antennas in the ETS system cannot be accommodated with existing patrol vehicles.¹⁷ Likewise, at lower frequencies, the increased size of components and antennas do not allow for their clandestine placement, and, when compressed, the small emitting devices do not operate as efficiently as is needed for critical life and death situations. At or below 200 MHz, it becomes increasingly difficult to transmit radio signals from these small transmitters out of confined spaces, such as the trunk of an automobile, where illegal narcotics or stolen property may be located.

¹⁷ To be effective in the 216-220 MHz band, the receiving antenna must be surrounded by a quarter wave length of continuous ground plane. In this band, a minimum antenna array of three antennas with spacing of approximately one foot apart is necessary for successful direction finding operations (i.e., approximately three feet of total ground plane). However, at lower frequencies, the amount of necessary ground plane increases. In light of the relatively small roof size of many patrol vehicles, tracking operations become impossible.

Similar technical problems exist at higher range frequencies. For example, at above 400 MHz, the path loss and efficiency of the available components results in the quality of the transmission from the small transmitter deteriorating rapidly, making these frequencies unsuitable for operations.

The excellent spectrum propagation of frequencies near the 220 MHz band for land mobile-type operations has been recognized by the Association of Public Safety Communications Officers, Inc. ("APCO") in the recent proceeding involving allocation of the 216-225 MHz band for narrowband use.¹⁸ APCO pointed out that the quality of land mobile use in this band is enhanced by low noise, absence of skip, minimal foliage absorption and ease of effective antenna construction.¹⁹

Location of the three ETS channels in the 216-220 MHz band poses no threat to existing uses of this band by the Automated Maritime Telecommunications System ("AMTS") or the Federal Government. Nor does this proposed allocation threaten adjacent users -- television channel 13 licensees at the low end of the band or the future 220-222 MHz licensees at the high end of the band.

In its Petition, ProNet seeks adoption of rules so that ETS can be provided under the Business Radio Service ("BRS"). Pursuant to Section 90.75(b) of the Commission's Rules, the 216-220 MHz band

¹⁸ Amendment of Part 2 of the Commission's Rules Regarding Allocation of the 216-225 MHz band, 3 FCC Rcd 5287 (1988) ("Allocation Order"), aff'd, 4 FCC Rcd 2333 (1989).

¹⁹ Id.

is allocated for the BRS on a secondary basis.²⁰ However, the availability of this band is limited because it currently is allocated to the maritime mobile service on a primary basis and to telemetry operations for the aeronautical mobile, fixed and land mobile services on a secondary basis:

Frequencies in the bands 216-220 MHz ... may be assigned to applicants under [Part 90] provided the band is listed in the individual radio service under which they establish eligibility. Use of these bands is limited to telemetering purposes only and all operation is secondary to Federal Government operations. Operation in the band 216-220 MHz is also secondary to the maritime mobile service Airborne use will not be authorized. Each application will be coordinated with the Federal Government by the Federal Communications Commission and is subject to such technical and operational limitations as may be imposed by the government. Each application should include precise information concerning emission characteristics, transmitter frequency deviation, output power, type and directional characteristics, if any, of the antenna, and the minimum necessary hours of operation.²¹

For the following reasons, ETS satisfies those conditions.²²

First, the basic "tag" beacon signal is limited to a telemetering function.²³ Second, ETS will operate on a secondary basis to Federal Government operations and all applications

²⁰ 47 C.F.R. Section 90.75(b) (1990).

²¹ 47 C.F.R. Section 90.75(c)(21) (1991) and 90.259 (1991).

²² See Section IV of ProNet's Petition for a more detailed discussion of why it is appropriate for ETS to be allocated spectrum in the 216-220 MHz band.

²³ The Commission defines "telemetering" or "telemetry" as the "transmission of nonvoice signals for the purpose of automatically indicating or recording measurements at a distance from the measuring instrument." 47 C.F.R. Section 90.7 (1990). ETS fits this definition.

therefore will be coordinated with the Federal Government.²⁴ Third, there is little, if any, potential that the low power ETS (i.e., it will not operate in excess of 120 milliwatts) would interfere with AMTS, which is the only known channelized service currently using this 216-220 MHz frequency band.²⁵ Finally, no airborne use of beacon transmitters is anticipated.²⁶

As the foregoing demonstrates, ETS would be able to operate on a previously allocated radio band without migrating incumbent licensees to another band or otherwise restricting their operations. Under these circumstances, spectrum efficiency would

²⁴ Indeed, based upon past experience, ETS will be utilized substantially by the FBI and other federal law enforcement authorities.

²⁵ The principle package (or host) for the priority law enforcement "tag" beacons have extremely limited battery source space. This in turn limits the battery source powered lifetime of the beacon to less than 2 hours under ideal environmental and shelf life conditions. Actually, in Tracking Systems' 18 years experience in experimental-developmental service with currently over 15,000 active beacons, the average "on" time of a beacon is only 15 minutes. The probability of occurrence and use of such a beacon is extremely low. When factored with the interference potential in time alone, it is reduced even more significantly. Again, with over 15,000 beacons fielded, an average of only approximately 300 activations are being experienced annually spread over some 12 U.S. metropolitan areas. Taking into account the time and range factors only, this indicates an interference potential of less than 500 feet. Beyond this, the interference potential is further reduced by the ratio of time use of the source that would receive such interference. In any event, ETS would be operated on a secondary basis to AMTS.

²⁶ It is possible but highly unlikely that a fleeing felon would take the stolen goods, with the hidden transmitter, aboard an aircraft. If this improbable event should occur, the transmitter power limitation of 120 milliwatts and the battery operating limitation of two hours should protect the public and appropriate adjacent licensees from harmful interference.

be maximized and spectrum sharing facilitated by granting ProNet's Petition and awarding it a Pioneer's Preference.

C. ETS is a licensable service

An entity seeking a Pioneer's Preference must file a petition for rulemaking requesting that spectrum be allocated to its service or that a rule be amended to accommodate its new technology.²⁷ As detailed in ProNet's Petition, it meets both these requirements.

ProNet requests that the Commission's Rules be amended to allocate three 8 KHz channels -- 218.0 MHz, 218.5 MHz and 219.5 MHz -- for ETS. ProNet also requests that the Commission amend certain provisions of Part 90 to accommodate ETS as a licensable service under the BRS. These proposed changes include adopting a definition for ETS, a limitation of one ETS licensee in each SMSA, summary procedures for selecting from among mutually exclusive ETS applicants, a provision for assigning more than one frequency per SMSA to each ETS licensee, and a provision for granting a blanket license to cover all the mobile transmitters.

IV. PRONET'S REQUEST FOR GRANT OF A PIONEER'S PREFERENCE SATISFIES THE REQUIREMENTS OF SECTION 1.402

Pursuant to Section 1.402, a party requesting grant of a Pioneer's Preference must submit the following:

pertinent information concerning its plan for implementing the service, the frequencies it proposes to use, the area for which the preference is sought, and must address any existing conflicting licensing rules such as multiple ownership, showing how these rules should or should not apply. The petitioner must demonstrate that it (or its predecessor-

²⁷ Pioneer's Preference, 69 Rad. Reg. (P&F) 2d at 147.

in-interest) has developed the new service or technology; e.g., that it (or its predecessor-in-interest) has brought out the capabilities or possibilities of the technology or service or has brought them to a more advanced or effective state. The petitioner must accompany its preference request with either a demonstration of the technical feasibility of the new service or technology, or an experimental license application, unless an experimental license application has previously been filed for that new service or technology. If the petitioner files or has filed an experimental license application, it must specify the area in which the applicant intends to conduct its experiment and whether that is the area for which a preference is sought.²⁸

As demonstrated below, ProNet herein satisfies these requirements.

A. ProNet's Plan for implementing ETS

ProNet has been operating ETS systems successfully for 18 years. Supported by this experience and by strong relationships with the law enforcement community and with the private sector (e.g., financial institutions), ProNet plans to continue expanding Tracking Systems' coverage and scope of services in existing markets and to enter new markets as appropriate. Moreover, ProNet is actively involved in significant research and development to improve ETS technology to an even more effective and advanced state.²⁹

²⁸ 47 C.F.R. Section 1.402 (1991).

²⁹ For example, ProNet is engaged in a major research and development effort designed to improve all ETS equipment areas. This includes further miniaturization of the beacon ("tag") to enhance its "hide-ability." A significant portion of this effort is involved in the type and unique ID coding of beacons. Finally, other significant de-sensing improvements to the police officer field tracking gear are being studied.

B. Frequencies proposed

ProNet proposes operating ETS permanently on three 8 KHz channels. These three channels are: (1) 218.0 MHz for felony tracking; (2) 218.5 MHz for law enforcement and training applications; and (3) 219.0 MHz for misdemeanor and less serious crime tracking. These channels were selected: (1) because they permit use of transmitters capable of operating in confined spaces where stolen goods often are secreted and receivers capable of being installed on law enforcement vehicles; (2) because of optimum propagation attributes; and (3) because of the relative lack of congestion. These channels would operate at a low power level not to exceed 120 milliwatts.

No re-allocation of spectrum would be necessary to accommodate ETS in the BRS. Pursuant to Section 90.75(b) of the Commission's Rules, the 216-220 MHz band is allocated to the BRS under certain conditions.³⁰ The 216-220 MHz band is allocated for the maritime mobile service on a primary basis, and for telemetering operations in the aeronautical mobile, fixed and land mobile services on a secondary basis.³¹ ETS can be operated as a secondary service under these restrictions.

C. ProNet's Tracking Systems developed ETS

ProNet's Tracking Systems is the sole developer of ETS. It holds two U.S. patents on the ETS technology.

³⁰ 47 C.F.R. Sections 90.75(b) (1991) and 90.75(c)(21) (1991).

³¹ 47 C.F.R. Sections 90.75(c)(21) (1991) and 90.259 (1991).

D. Tracking Systems operates its ETS under Experimental Licenses

Tracking Systems operates 12 ETS systems nationwide pursuant to Experimental License.

E. Proposed service area

The Commission intends limiting the area of a Pioneer's Preference award to a single city or region. However, the Commission conceded that "[w]here a service is inherently nationwide, [it] will consider granting a nationwide preference."³²

ETS is inherently a nationwide service. Consequently, for the following reasons, ProNet hereby requests grant of a nationwide preference.

Crime is not bound by artificial jurisdictional limits. ETS involves coordination with various law enforcement agencies in numerous local, regional and federal jurisdictions. To optimize the effectiveness of criminal tracking procedures and to increase the ability of law enforcement agencies to apprehend fleeing felons, the ETS licensee must be able to implement its radiolocation service without limit across jurisdictional boundaries. On any single case involving tracking a criminal, if the law enforcement agencies must deal with different ETS licensees, critical time could be lost, confusion could occur, and the felon could escape.

The risks and investment made by ProNet in Tracking Systems over the past 18 years also compel award of a nationwide

³² Pioneer's Preference, 69 Rad. Reg. (P&F) 2d at 150.

preference. No other entity has stepped forward to provide a similar service. It would be patently unfair to allow a newcomer to exploit Tracking Systems' success, expertise and experience. Indeed, as the Commission acknowledges, operating under Experimental License provides ample "evidence that a party has expended significant resources and capital in the development of the new service or technology."³³ ProNet's commitment is not speculative. ProNet already has demonstrated this commitment by orders of magnitude beyond any other potentially interested entrepreneur.

Moreover, as evidenced by the support for Tracking Systems in the 220 MHz Order, law enforcement authorities across the country trust its competency and experience. Protection of safety to property and person is the paramount interest to be served. Opening the door to inexperienced ETS pretenders would severely risk the trust of law enforcement authorities and endanger the public safety.

If the Commission, however, decides against granting ProNet a nationwide preference, it should, at a minimum, grandfather Tracking Systems' existing 12 Experimental Licenses and grant a Pioneer's Preference for those markets. Tracking Systems' ETS

³³ Id. at 148.

works in those markets. To displace Tracking Systems would be imprudent and quite disruptive to effective law enforcement efforts.³⁴

CONCLUSION

ProNet deserves grant of a Pioneer's Preference for ETS because it meets the applicable standards established by the Commission. ProNet's Tracking Systems provides an innovative, publicly beneficial service that will lead to the establishment of a service on a permanent basis. It offers added functionality and different uses of the spectrum; it significantly reduces social and commercial consumer costs associated with crime; and it yields efficiencies in spectrum use and facilitates spectrum sharing.

WHEREFORE, for the foregoing reasons, ProNet Inc. hereby requests that the Commission award a Pioneer's Preference for ETS as proposed herein.

Respectfully submitted,

PRONET INC.



Robert J. Miller
Gardere & Wynne
1601 Elm Street, Suite 3000
Dallas, Texas 75201
Its Attorney

Date: July 30, 1991

62950/GW01

³⁴ The Commission, in fact, contemplates awarding a Pioneer's Preference for those markets where the subject technology has or will operate under Experimental License. "[I]t would certainly be reasonable simply to use the area for which [the party requesting a Pioneer's Preference] receives its experimental license as basis for a license in the authorized service." Pioneer's Preference, 69 Rad. Reg. (P&F) 2d at 150.

2400 Lakeside Boulevard, Suite 450, Richardson, Texas 75082
 United States of America
 FEDERAL COMMUNICATIONS COMMISSION
 EXPERIMENTAL
 RADIO STATION CONSTRUCTION PERMIT
 AND LICENSE

EXPERIMENTAL
 (Nature of Service)

K K 2 X J V
 (Call Sign)

XD MO
 (Class of station)

0923-EX-AL-88
 (File number)

NAME ELECTRONIC TRACKING SYSTEMS, INC

Various locations within the United States
 (Location of station)

Subject to the provisions of the Communications Act of 1934, subsequent acts, and treaties, and all regulations heretofore or hereafter made by this Commission, and further subject to the conditions and requirements set forth in this license, the licensee hereof is hereby authorized to use and operate the radio transmitting facilities hereinafter described for radio communications.

Frequency MHz	Authorized Power (watts)	Emission Designator
219.96	1	80KOP0N

Frequency Tolerance: $\pm 0.005\%$

Operations in accordance with Section 5.202(h)

Special Condition:

- Locations shall be notified and approved by the FCC prior to start of operations. Licensee shall make all efforts to change appropriate FCC Rules to allow for this operation on an operational basis.

This authorization effective October 1, 1988 and
 will expire 3:00 A.M. EST October 1, 1990

FEDERAL
 COMMUNICATIONS
 COMMISSION

EXHIBIT 2

MARKET PROFILE CITY DATA

DETERRENCE:

One of the most important factors in determining the performance of the Electronic Tracking Service ("ETS") are data derived over Tracking Systems' 18 year experimentation period. One measure of deterrence is the actual number of robberies in a year (per police records) in categories of interest. If the ETS system is effective, then the number of robberies will decrease. In each of the markets where ETS operates, this has occurred at substantial levels.

However, as is usually the case in statistical data, this does not tell the whole story. Robberies actually decreased even more than indicated in the raw data. The reasoning is clear. If only a few robbers were committing most of the crime (and they are, each robber robbed banks approximately 10 times a year in San Francisco), then the robberies would fall off proportional to the number of robbers captured and incarcerated. Indeed, this did happen and could be shown on close inspection of the actual data base on a month to month basis, but it is too cumbersome to show here.

FBI statistics over the 18 year period show a 16% average growth rate in crime across the nation. (In the San Francisco Bay area, over a 5 year period, exempting San Francisco proper because of its ETS, the growth rate in bank robberies was 65%.) Thus, the data showing deterrence are understated by at least the 16% growth rate.

IMPACT:

A second and indirect measure of ETS' performance in the markets experimentally tested over the last 18 years is the impact of the system in terms of overall crime reduction. Closely associated with deterrence, this measure is the effect of the multiplication factor of how many robberies a single robber commits in a single year.

As mentioned previously, in San Francisco, a robber typically hits one bank or another on the average of 10 times a year. In Las Vegas, on the other extreme, robbers tend to hit a bank only twice a year. There are many causes for this differing rate, but two are paramount. First, in San Francisco, the money till is kept lean. Not much money is taken in each robbery causing the robber to have to return again next month to supplement his need. In Las Vegas, cash is available everywhere to feed the money machines in Las Vegas. Secondly, in Las Vegas the robbers are transient and they rob to fulfill a gambling need. In San Francisco the robbers are residents.

CITY PROFILES

Both the deterrent and impact effects of ETS are clearly evidenced in the data presented for the cities selected. Although the impact data are subjective, they are based on the average rate of recurrence of robberies for individuals captured.

Tracking Systems currently is active in 12 market areas in the U.S. Not all the data available are presented because some are so recent as to be statistically meaningless. Other data on smaller cities cannot show any trend because of the city's proximity to another larger city or area. The current markets and active cities are detailed with the date in which ETS was installed and made operational. In all cases, data are included for five years previous to ETS installation so that trends can be seen.

The 12 experimental markets are listed below:

SHREVEPORT, LA -- including Bossier City

Although this city is small, it is included because it is the location of the initial and longest experiment.

SAN FRANCISCO, CA -- including the cities of Oakland and Berkeley

This city is included because adequate data are available over an extended period.

LAS VEGAS, NV -- including North Las Vegas

This city is included as reliable data are available.

ANCHORAGE, AK -- including Eagle River

Comments on this city are included although reliable data are not available.

AUSTIN, TX --

This city is included as reliable data are available.

SACRAMENTO, CA -- including the entirety of Sacramento County

This city is included as reliable data are available.

LOS ANGELES, CA -- including only the Los Angeles County jurisdictions known as Lakewood, Norwalk, the independent cities of Long Beach, Signal Hill, Glendale, Burbank, and Pasadena. Orange County is covered in its entirety, including the cities of Anaheim, Fullerton, Santa Ana, Huntington Beach, Buena Park, La Habra, Brea, Placentia, La Palma, Los Alamitos, Seal Beach, Garden Grove, Fountain Valley, Costa Mesa, Westminster, Tustin, Orange, Newport Beach, Cypress, Irvine, and San Clemente.

These areas are not included because no single increment is indicative in Orange County. There are insufficient data available because ETS has only been on line for just under a year.

DALLAS, TX -- including the cities of Highland Park, University Park, Richardson, Addison, Farmers Branch, and Carrollton.

This city is included as reliable data are available.

RENO, NV -- including the cities of Sparks, Carson, Minden, and the nearby populated area of Washoe County.

This city is not included as reliable data are not available.

PORTLAND, OR

This city is not included because ETS has been installed for less than a year.

HOUSTON, TX -- including Hedwig Village, The Villages, and Spring Valley.

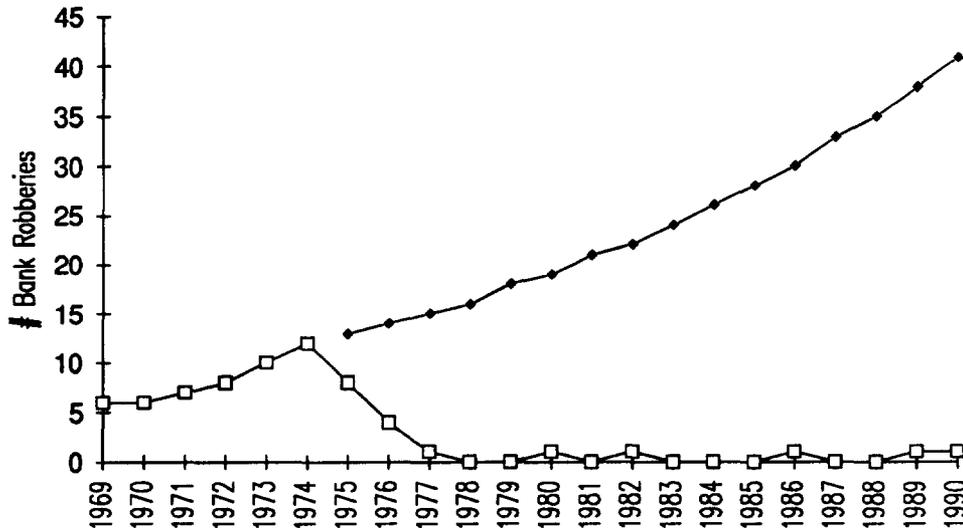
This city is not included because ETS has been installed for less than a year.

PHOENIX, AZ

This city is not included because ETS has been installed for less than a year.

GW03:69865

SHREVEPORT, LA
ETS Introduced 1974



Shreveport

Shreveport, Louisiana was selected in 1973 as the original FCC Experimental-Research test bed. This test bed also includes Bossier City. Even though Shreveport had a population of approximately 100,000, it was selected to ensure that adequate controls would be in place to measure the results without the burdens of big city bureaucracy. Additionally, Shreveport exhibited the normal 16% growth rate in financial institution robberies.

The equipment, police, and bank tellers worked well in the real world environment. The deterrent effect is clear from the above data. Shreveport area bank robbers were promptly caught by ETS and incarcerated. The impact effect (indicating the robberies that would have occurred had the growth in robberies continued at a modest 8% rate) is equally obvious.

Two effects were observed outside the domain of our original inquiry

1. The capture of the robber during the get-a-way phase produce court's "best evidence", which has resulted in a 100% conviction rate in all ETS operations nationwide since that date.
2. The availability of court's "best evidence," provide District Attorneys confidence to go to trial without plea bargaining.



JOHN HUSSEY
MAYOR

Shreveport Police Department

P. O. DRAWER P.

Shreveport, Louisiana 71161

April 25, 1990



CHARLES A. GRUBER
CHIEF OF POLICE

Federal Communication Commission
1919 M Street N.W., Room 222
Washington, D.C. 20036

Attention: Office of the Secretary - Donna Searcy

Dear Ms. Searcy:

Reference: In the matter of Part 90 of the Commission's Rules to provide for the use of the 220-222 MHz Band by the Private Land Mobile Radio Service

PR DK No. 89-552

The Shreveport Police Department wishes to voice support of the comments of Electronic Tracking System, Inc., with regards to rule-making described in the reference above.

We became involved with Electronic Tracking System (ETS), in 1972 and have found it to be a valuable tool in critical law enforcement areas. Specifically, our department had experience with ETS in the area of financial institutions robbery, where Electronic Tracking System has resulted in robbery felon apprehension and subsequent conviction under circumstances that typically would have resulted in the escape of the suspect. Over a period of time, we have experienced an overall decline in our robbery rate, and this has led to increased personal safety for financial instituting customers and employees, as well as the citizens of our community.

Federal Communication Commission
Page 2
April 25, 1990

A specific case where the Electronic Tracking System was particularly useful to us occurred recently. A Pioneer Bank was robbed, and having no description of the suspects or suspects' vehicle, we were able to track the suspects using vehicle units to an apartment complex and handheld units to a closet in a specific apartment. Four suspects were arrested and all stolen money was recovered.

If you need additional information, please call me at 318-226-6279.

Sincerely,

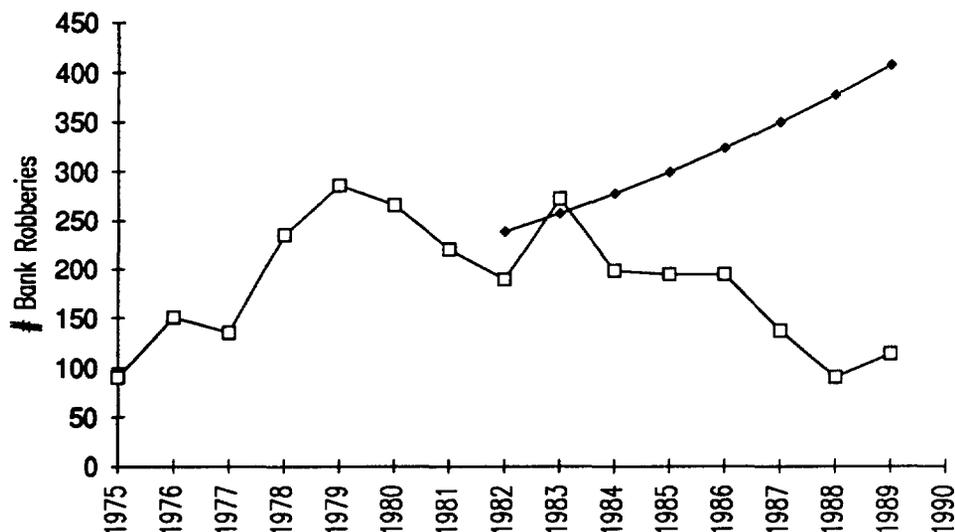
CHARLES A. GRUBER
CHIEF OF POLICE



Sergeant W. C. Hunter
Associate Account Service Representative

WCH/cp

SAN FRANCISCO, CA
ETS Introduced 1981



San Francisco

San Francisco, California was selected as the second test bed for ETS. This test bed includes Oakland and Berkeley across the Bay.

This area represented the problems and complexities of a big city with all the attendant problems and crime therein. Operation in the rolling terrain of Shreveport under straightforward conditions was one thing. Operation in the hilly and mountainous terrain of San Francisco provided significantly different testing parameters.

All elements in San Francisco came together much as they had in Shreveport, with one specific exception. Two major banks in the area decided to take a "wait and see" approach (where in Shreveport there was 100% participation) resulting in a less than 50% initial coverage to effect bank robbery deterrence.

Immediate effects of deterrence in this much more complicated situation do not show in the deterrence curve presented above during the initial few years. However, ETS' impact is easily seen in the impact curve (where bank robbery growth is shown as increasing at a modest 8%, 1/2 the national average). Nevertheless, in 1986, the two large hold-out banks saw the effects, joined in ETS and from that time forward dramatic improvement is seen in both the deterrent and impact curves.

San Francisco Continued:

Senior San Francisco Police Department Bank Robbery Squad detective Tim Casey (the man who caught/recovered Patty Hearst) said "Until we got ETS we hardly ever caught a bank robber unless he tripped over a fire plug and fell in front of a police car."

ETS determined that robbers in San Francisco, were predominantly local, that they tended to rob 10 banks a year, and that they were often involved in "apprentice" programs. With the aid of ETS, police even caught and incarcerated a few bank tellers. Finally, Tracking Systems identified others involved in the crime that were not recognized as such at the scene.



POLICE DEPARTMENT
CITY AND COUNTY OF SAN FRANCISCO
HALL OF JUSTICE
850 BRYANT STREET
SAN FRANCISCO, CALIFORNIA 94103

ADDRESS ALL COMMUNICATIONS:
FRANK M. JORDAN
CHIEF OF POLICE

April 20, 1990

IN REPLY, PLEASE REFER TO
OUR FILE: IR/820

Federal Communications Commission
1919 M Street N.W.
Office of the Secretary
Donna Searcy
Room 222
Washington D.C. 20036

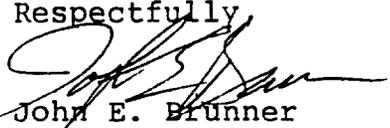
Dear Ms. Searcy:

I have been involved with the ETS system since March 27, 1981 when Texas Instruments brought the system to San Francisco. The San Francisco Police Department has made a very effective use of the Electronic Tracking System in the banking institutions of San Francisco since that time. Our bank robbery rate has dropped since ETS has been installed in our City. We look forward to the time that we are able to utilize additional radio frequencies for such items as tracking suspects involved in incidents other than bank robberies.

At this time we have only one frequency that is used City wide, for bank incidents. The addition of extra radio frequencies would allow us the option of property tags of high value items such as placing an ETS unit on a motorcycle and placing it in an area of high theft, then following the stolen item to the location that it is taken to.

I fully support the application of ETS Inc. for additional frequencies that is now before you for consideration.

Respectfully,


John E. Brunner
Lieutenant #820
Robbery Section



POLICE DEPARTMENT
 CITY AND COUNTY OF SAN FRANCISCO
 HALL OF JUSTICE
 850 BRYANT STREET
 SAN FRANCISCO, CALIFORNIA 94103

April 20, 1990

ADDRESS ALL COMMUNICATIONS:
FRANK M. JORDAN
 CHIEF OF POLICE

IN REPLY, PLEASE REFER TO
 OUR FILE: IR/820

APR 23 1990

Mr. Bob Tall
 Executive Director
 APCO

Dear Bob:

Please excuse me for sending you a FAX rather than a mail letter on the matter of ETS Inc. application for additional radio frequencies with the F.C.C.

The San Francisco Police Department has been involved with the ETS system since March 27, 1981. Our City has utilized the ETS system successfully since that time, with a major drop in Bank Robbery incidents due to the ETS System. I have personally been involved in the capture of 82 bank robbery suspects since the program began and I feel that the ETS System is a great boom to Law Enforcement.

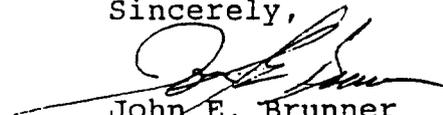
I have taken the liberty of sending a letter to the F.C.C. and a copy of that letter is being faxed with this letter.

I have been informed by ETS that their application reference is as follows:

In the matter of Part 90 of the Commission's Rules to Provide for the Use of the 220-222 MHz Band by the Private Land Mobile Radio Services, PR DK. No. 89-552

Your consideration and support in this matter will be a great aid to Law Enforcement within the United States.

Sincerely,


 John E. Brunner
 Lieutenant #820
 Robbery Section



JOHN E. BRUNNER
 LIEUTENANT



Bank of America

Corporate Security Services #3259
1455 Market Street, 10th Floor
San Francisco, CA 94103

RECEIVED
APR 23 1990

April 24, 1990

Federal Communications Commission
1919 M Street N.W., Room 222
Washington, D.C. 20036

Attn: Office of the Secretary: Donna Searcy

REFERENCE: In the matter of Part 90 of the Commission's
Rules to Provide for the Use of the 220-222
MHz Band by the Private Land Mobile Radio
Services

PR DK. NO. 89-552

Dear Commission Members:

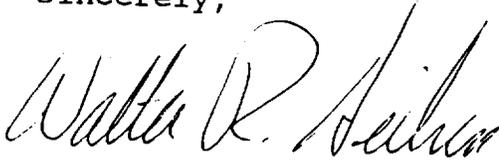
We wish to express our support of the comments of ProNet Tracking Systems (PTS), formerly Electronic Tracking Systems, with regards to the above referenced matter.

Bank of America began using the PTS robbery deterrent devices in San Francisco in 1983, and has expanded use of the devices in Northern and Southern California communities where it has become available. We have found the PTS devices to be a highly effective robbery deterrent. The number of our Bank robberies and robbery losses have been significantly reduced in those areas where the PTS devices are in use. Use of the PTS devices has also resulted in an increase in the number of robbers that have been arrested and convicted, that typically would not have been apprehended. We feel the PTS devices are the most effective loss prevention tool currently available to safeguard the Bank's assets, customers and employees.

Federal Communications Commission
April 24, 1990
Page 2

If you would like specific case information or details regarding the number of devices and locations used, please call me at (415) 622-3757.

Sincerely,



Walter R. Heilner
Vice President and
Senior Deputy Director

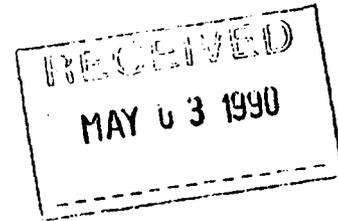
WRH:fn

bcc: J. H. Bailey
Harry A. Currie



WELLS FARGO BANK

Security Administration
525 Market Street, 25th floor
San Francisco, California 94105



April 24, 1990

Federal Communications Commission
1919 M. Street NW Rm. 222
Washington, D.C. 20036

Attention: Donna Searcy

Reference: In the matter of Part 90 of the Commission's Rules
to Provide for the Use of the 220-222 MHz Band by the Private
Land Mobile Radio Services

PK DK NO. 89-552

Dear Sirs:

We wish to voice our support of the comments of Electronic
Tracking Systems Inc. with regards to rule-making described in
the reference above.

We became involved with ETS and the Electronic Tracking System
in 1984 and have found it to be a valuable tool in critical law
enforcement areas. Specifically, our organization has had
experience with ETS in the area of financial institution
robbery, where the Electronic Tracking System has resulted in
robbery felon apprehension and subsequent conviction under
circumstances that typically would have resulted in the robber
getting away.

During this time, we have experienced an overall decline in our
robbery rate, in the locations it has been used. This has lead
to increased personal safety for financial institution customers
and employees, as well as for citizens of our community.

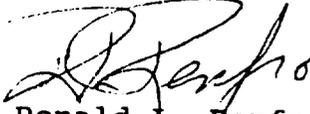
The Electronic Tracking System has been particularly useful to
our bank on many occasions resulting not only in the
apprehensions, but in the full recovery of the stolen money.

Page (2)
Federal Communications Commission
April 24, 1990

During the past two years over sixty thousand dollars per year has been recovered through the use of the ETS product.

If you need additional informational please call (415) 396-3857.

Sincerely,



Ronald L. Renfro
AVP/Security Manager

mw

cc: Harry A. Currie

Handwritten 4/23/90

Best Products Co., Inc., 6601 Owens Drive, Suite 140, Pleasanton, CA 94588-3356 415/463-3301

April 23, 1990

Federal Communications Commission
1919 M Street NW, Rm. 222
Washington, DC 20036

ATT: Office of the Secretary - Donna Searcy

REF: In the matter of Part 90 of the Commission's Rules
to Provide for the Use of the 220-222 MHz Band by
the Private Land Mobile Radio Services

PR DK. NO. 89-552

Dear Sirs:

Best Products wishes to voice its support of the comments of
Electronic Tacking Systems Inc. with regards to rule-making
described in the reference above.

We became involved with ETS and the Electronic System in 1989 and
have found it to be a valuable tool in critical law enforcement
areas. Specifically, our organization has had experience with
ETS in the area of armed robberies of our jewelry departments
where the Electronic Tracking System has resulted in the
apprehension of the suspects and the recovery of our merchandise
under circumstances that typically would have resulted in the
robbers getting away. Over time, we have experienced an overall
decline in our robbery rate where we employ the system which has
led to increased personal safety for our employees and customers.

Specifically, we recently experienced robberies in both Santa Ana
and Huntington Beach, California and in both cases the suspects
were apprehended. If you need additional information from me,
please call (804) 261-2112.

Sincerely,

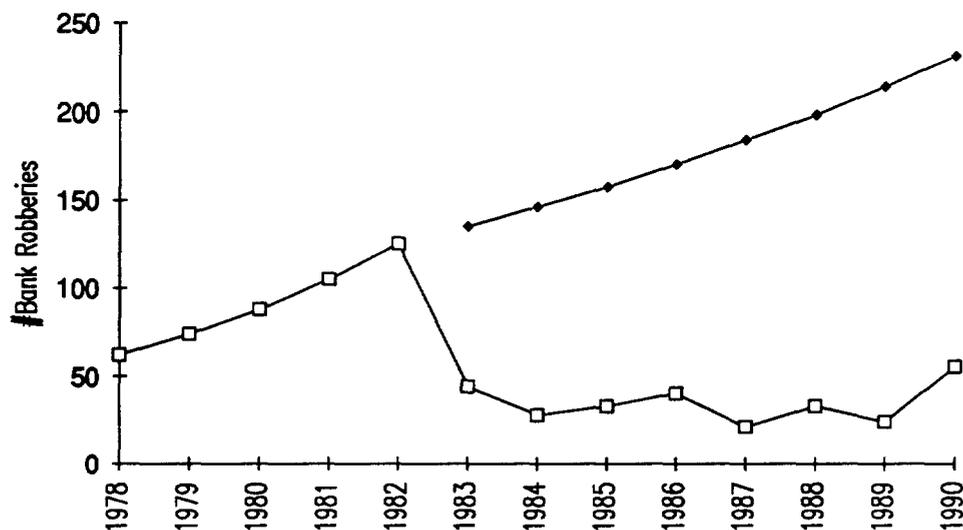
Shelley Connors

Shelley Connors
Director of Loss Prevention

SC/hh

BEST

LAS VEGAS, NV
ETS Introduced 1983



LAS VEGAS

The cities of Las Vegas and North Las Vegas combine to form a circular area of which North Las Vegas is a pie wedge in the northern portion. Late in 1983, the area police departments were certified and the ETS system became operational. The casinos of Las Vegas guard their money carefully and transfer it promptly to the banks. However, given the transient population and the gambling milieu, the number of bank robberies is high.

Equipped with the helicopters and a group of well-trained and disciplined officers with the aid of ETS, the Las Vegas Police reduced burgeoning bank robbery by 65% in their first 9 months of operation.

The technical challenge in Las Vegas was temperature. Hot summer daytime temperatures drive ETS vehicle dashboard displays and trunk mounted receiver to temperatures in excess of 165 degrees Farenheit. Lessons were learned about circuit breakers that blow due to temperature, rather than high current flow, and about plastics that should, but, do not, withstand direct sunlight and extreme temperatures. As a result of these climatic problems, Tracking Systems was able to improve its equipment to withstand such climatic problems.



Las Vegas Metropolitan Police Department

400 EAST STEWART AVENUE
LAS VEGAS, NEVADA 89101-2984
PHONE 702/795-3111

JOHN MORAN, Sheriff

ERIC S. COOPER, Undersheriff

DAN STOPKA,
Assistant Sheriff
Line Operations

STEVE WAUGH,
Assistant Sheriff
Staff Operations

APR 30 1990
WALTER B. MYERS,
Deputy Chief
Field Services Div.

April 26, 1990

JOHN L. SULLIVAN,
Deputy Chief
Investigative Services Div.

LARRY C. BOLDEN,
Deputy Chief
Technical Services Div.

Federal Communications Commission
1919 M Street NW, Room 222
Washington, C.C. 20036

TOM C. CRAWFORD,
Deputy Chief
Administrative Services Div.

GORDON F. YACH,
Director
Detention Services Div.

ATTN: OFFICE OF THE SECRETARY: DONNA SEARCY

**REF: In the matter of Part 90 of the Commission's
Rules to Provide for the Use of the 220-222
Mhz Band by the Private Land Mobile Radio
Services**

LOIS ROETHEL,
Director of Financial Svcs.
Fiscal Affairs Bureau

PR DK. NO. 89-552

Dear Sirs:

We wish to voice our support of the comments of Electronic Tracking Systems, Inc., with regard to rule making described in the reference above.

We became involved with ETS and the Electronic Tracking System in 1984 and have found it to be a valuable tool in critical law enforcement areas. Specifically, our organization has had experience with ETS in the area of financial institution robbery, where the Electronic Tracking system has resulted in robbery felon apprehension and subsequent conviction under circumstances that typically would have resulted in the robber getting away. Over time, we have experienced an overall decline in our robbery rate and this has led to increased personal safety for financial institution customers and employees as well as the citizens of Las Vegas.

Sincerely,

JOHN MORAN, SHERIFF

BY: RICHARD MCKEE, CAPTAIN
COMMUNICATIONS BUREAU

RM:ht



**PRIMERIT
BANK**

*PriMerit Bank, Federal Savings Bank
Post Office Box 98599
Las Vegas, Nevada 89193-8599
702.562.5555*

*J. Roger Ouellette
Director of Security*

July 15, 1991

Federal Communication Commission

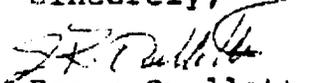
Gentlemen:

PriMerit Savings Bank has had the electronic tracking system for many years now and this system has proven to us that it is by far the best system available to recover our losses in bank robberies. The apprehension rate of these criminals has been about 98 percent so far for our bank, thus minimizing our losses.

We are looking forward to the final installation and expansion of coverage for the Phoenix area to cover our branch's at Scottsdale, Mesa, Sun City, etc.

ProNet has our support for expansion of this system since it has proven to have a great impact on reducing our losses.

Sincerely,


Roger Ouellette
Director of Security

RO/dtc



Valley Bank of Nevada

MEMBER FDIC

Security Division
P. O. Box 98600
Las Vegas, Nevada 89193-8600
Telephone (702) 654-1227

RECEIVED
APR 23 1990

April 19, 1990

Federal Communications Commission
1919 M Street NW Rm. 222
Washington, D. C. 20036

Attn: Office of the Secretary - Donna Searcy

Reference: In the matter of Part 90 of the Commission's Rules to provide for the use of the 220-222 MHz Band by the Private Land Mobile Radio Services

PR DK. NO. 89-552

Dear Sirs:

Valley Bank of Nevada wishes to voice its support of the comments of Electronic Tracking Systems Inc. (ETS) with regards to rule-making described in the reference above.

We became involved with ETS in 1984 and have found it to be a valuable tool in critical law enforcement areas. Specifically, our organization has had experience with ETS in the area of robberies of our branches, where the ETS has resulted in robbery felon apprehension and subsequent conviction under circumstances that typically would have resulted in the robber getting away. Over time, we have experienced an overall decline in our robbery rate where we employ the system, and this has led to increased personal safety for our employees and customers.

A specific case where ETS was particularly useful to us was on 3/12/90. A suspect entered our Nellis Harris Branch and shouted, "This is a hold-up, everyone down!" He jumped over the teller counter, and demanded that the three tellers open their drawers. He removed currency, and ETS units. He again jumped over the counter and fled the building. Approximately 15 minutes later, the suspect and accomplice were apprehended. The suspects were driving a motor home and were in possession of several firearms and a large quantity of ammunition. Nineteen thousand five hundred dollars including the ETS units were also recovered. Metro was able to locate the suspects from the signals being transmitted by the ETS units. It was later learned that the two suspects were wanted by the San Diego PD for numerous robberies in their city. If you need additional information from me, please call (702) 654 1227.

Sincerely,

Jimmy Gastineau
Security Officer

JG/lh

ANCHORAGE, ALASKA

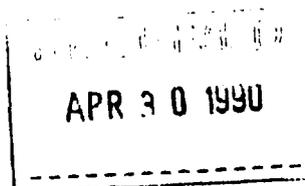
Although reliable deterrent/impact data are not readily available at this time, use of ETS in Anchorage has provided important information about use of the equipment in extremely cold temperatures.

Anchorage experiences significant snowfall in the winter, averaging up to 14 inches a day for fresh falls. Limited antenna heights with delta phase antenna whips deep in snow atop operating police vehicles posed an interesting learning experience especially when coupled with -40 degree Farenheit lows. Equipment was modified to accommodate this environment.

In one armed robbery of a super market, three robbers were trapped in the store after announcing their intent with multiple shots into the ceiling. The prompt arrival of the patrol officers from across the parking lot caused them to run through the store and attempt to escape out the back. The officers beat them to the exit thanks to the accuracy of the ETS on board. Within minutes, three robbers were caught.

CARRS

QUALITY CENTERS



1341 Fairbanks Street

Anchorage, Alaska 99501

(907) 277-6639

April 25, 1990

Federal Communications Commission
1919 M Street NW Rm. 222
Washington, D.C. 20036

ATTN: Office of the Secretary: Donna Searcy

Reference: In the matter of Part 90 of the Commission's
Rules to Provide for the Use of the 220-222 MHz
Band by the Private Land Mobile Radio Services

PR DK. NO. 89-552

Dear Sirs:

We wish to voice our support of the comments of Electronic Tracking Systems Inc. with regards to rule-making described in the reference above.

We became involved with ETS and the Electronic Tracking System in 1986 and have found it to be a valuable tool in critical law enforcement areas. Specifically, our organization has had experience with ETS in the area of robbery, where the Electronic Tracking System has resulted in robbery felon apprehension and subsequent conviction under circumstances that typically would have resulted in the robber getting away. Over time, we have experienced an overall decline in our robbery rate, and this has led to increased personal safety for customers and employees, as well as the citizens of our community.

A specific case where the Electronic Tracking System was particularly useful to us was during a robbery which occurred at one of our stores in October, 1987. Three suspects were involved. One was killed in a police shootout, one was captured at the store and one escaped but was subsequently captured when his location was pinpointed by the Electronic Tracking System.

If you need additional information from me, please call at 907-564-2544.

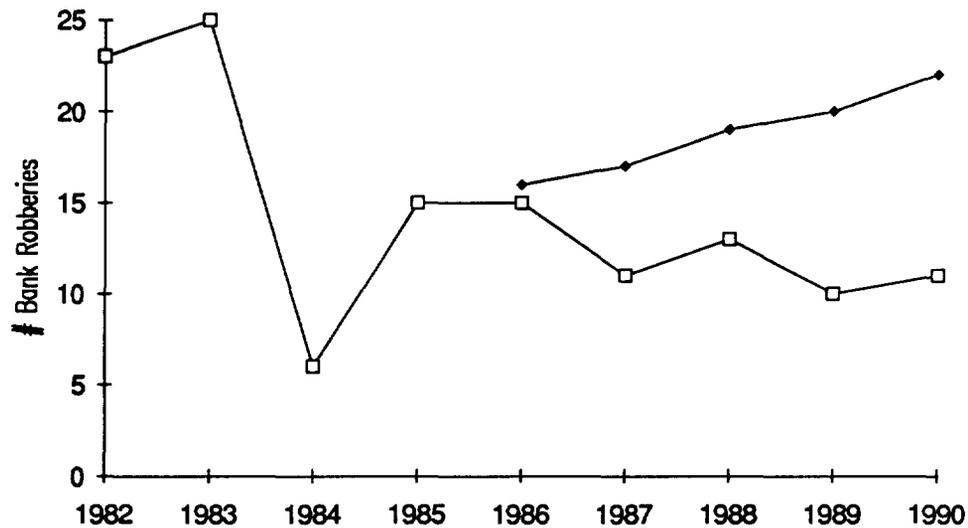
Sincerely,

A handwritten signature in dark ink, appearing to read "M. Peter Johnson, Jr." with a stylized flourish at the end.

M. Peter Johnson, Jr.
Director of Loss Prevention

cc: Harry A. Currie, Vice President, Operations & Technology
Electronic Tracking Systems Inc.
P. O. Box 260409, Plano, Texas 75026-0409

AUSTIN, TX
ETS Introduced 1984



AUSTIN

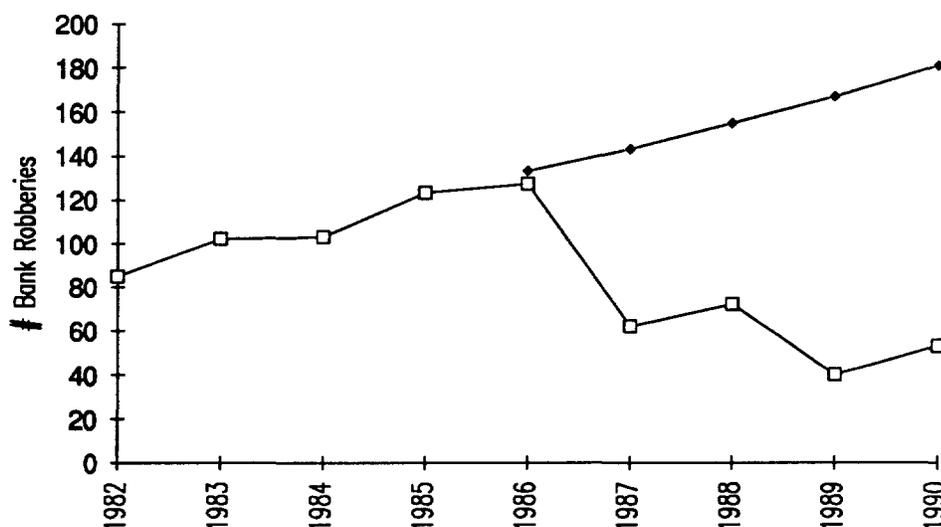
Austin, Texas was selected as a test bed for ETS because it represented a typical, medium-sized American city with three specifically distinct attributes: the seat of a state capital, the seat of a major state college, with proximity to Mexico, and a sizable Hispanic population. None of these factors proved to be important, however.

The most critical factor favoring almost immediate success of system operations accompanied by ease of installation and training was the lack of bureaucracy in Austin. Our experience is similar throughout the markets tested and surveyed. Big government is just hard to work with effectively. Nevertheless, ETS has been effective in larger cities, but it has been harder to start-up and implement.

The above curve speaks fluently of the statistics of ETS' impact in Austin.

In fact, recently, a new small bank opened in downtown Austin. It was robbed on opening day of more than \$120,000. The new bank would have closed that same day but for complete recovery of the stolen funds by the police, using the ETS system in less than eight minutes.

SACRAMENTO, CA
ETS Introduced 1985



Sacramento

Sacramento, California, operations include the city of Sacramento and its Police Department, and it includes the County of Sacramento and its Sheriff's Department. Coincidentally, the city of Folsom, and the famous Folsom Prison lie entirely in the county and house many of the bank robbers caught by the police using ETS throughout California.

Several specific areas of ETS were tested in this community.

1. The coordination between "competing" departments (i.e. City Police Department and County Sheriff's Department).

The competitive aspect proved effective. It helped overcome the stagnancy of the bureaucracy and made both departments coordinate their efforts towards a common goal.

2. An attempt to cover a large, county-wide area.

Significant population in the Sacramento area is resident in unincorporated county areas. These areas are suburban in nature. With the aid of good roads and freeways and a dedicated helicopter force, operations throughout the county were as successful as in any city.

Sacramento Continued:

3. The wide scale use of ETS devices for stake-out purposes under the direction and control of the police.

ETS supplied 75 stake-out devices for use in a trial project that has proven so successful that it continues to this day, 5 years later. Smaller businesses are "loaned" stake-out devices under the direction and control of the police for a limited time during periods when these types of businesses are under duress from robbers. Over 50 people have been incarcerated as a result of this project in Sacramento.

SACRAMENTO COUNTY



SHERIFF'S DEPARTMENT

Glen Craig
Sheriff

April 19, 1990

Federal Communications Commission
1919 M Street NW Room 222
Washington, D.C. 20036

APR 23 1990

ATTN: Office of the Secretary - Donna Searcy

Reference: In the matter of Part 90 of the Commission's Rules to Provide for the Use of the 220-222 HMz Band by the Private Land Mobile Radio Services.

PR DK. 89-552

Dear Sirs:

The Sacramento Sheriff's Department wishes to voice it's support of the comments of Electronic Tracking Systems Inc. with regards to rule-making described in the reference above.

We became involved with ETS and the Electronic Tracking System in 1984 and have found it to be a valuable tool in critical law enforcement areas. Specifically, our organization has had experience with ETS in the area of robberies of Sacramento financial institutions, where the Electronic Tracking System has resulted in robbery felon apprehension and subsequent conviction under circumstances that typically would have resulted in the robber getting away. Over time, we have experienced an overall decline in our robbery rate where we employ the system, and this has led to increased personal safety for the citizens who live and/or work in Sacramento. To date, more than 100 felony arrests have been made as a direct result of this system.

In addition we are using this system for investigative applications, primarily in our Narcotic Bureau. We have used ETS transmitters to stay on top of large amounts of "flash" money, to assist in staying with our undercover officers and in following suspect vehicles. We are gradually expanding the use of the system into other areas of investigation.

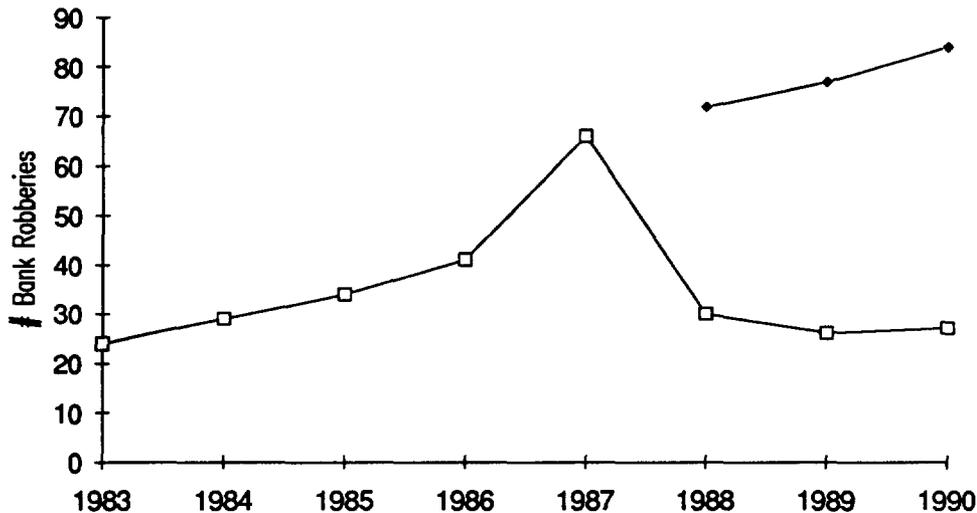
If you need additional information, please call me at (916) 440-5277.

Sincerely,

Philip J. Davis
Captain Phil Davis
Technical Services Division

PD:jm

DALLAS, TX
ETS Introduced 1987



DALLAS

Dallas, Texas was the first true multi-city/metropolitan use of ETS. Seven adjacent cities in the Dallas/Ft. Worth metroplex cooperate in the use of ETS.

Specific features of the system include the interaction of three Area Wide Monitors and seven police jurisdictions to form the ETS "network." This network involved the training of hundreds of police patrol officers and their responsive chain of commands from seven differing points of view.

Many interwoven intra- and inter-departmental policies and procedures have been involved. In some cases, complete inter-departmental procedures had to be generated for the first time, including both the cooperative areas of hot pursuit and search and seizure. Nevertheless, robbers began to be quickly caught and the ETS system acceptance and performance was both effective and appreciated throughout both the police and banking communities.

During the period of installation in the Dallas area, a bank robber, dubbed "The Dapper Bandit," (he dressed nicely and acted courteously) was terrorizing banks from Dallas to San Antonio. He had robbed 22 banks in the course of 10 years for a half million dollars. The police had good video and 35 mm evidence on him, but no leads. Shortly, after ETS was set-up in Dallas, he hit a small bank in the northern portion of that city. He vaulted the counter, inspected and took money from three teller drawers. Ten minutes later he was in custody; another "victim" of ETS.

Dallas Continued:

In addition, this felon was involved in making bomb threats. The police, using ETS, actually were working a stake-out on a bomb threat he was conducting at the time of his capture. On searching his apartment and second vehicle, real bombs were found ready to be detonated.



CITY OF DALLAS

July 18, 1991

Federal Communications Commission
1919 M. Street NW, Room #222
Washington, D.C. 20036

ATTN: OFFICE OF THE SECRETARY: DONNA SEARCY

REFERENCE: IN THE MATTER OF PRO NET INC. PETITION FOR RULE MAKING FOR
THE PERMANENT PROVISION OF ELECTRONIC TRACKING SERVICES

Dear Sir:

The Dallas Police Department wishes to voice its support of the petition submitted by Pro Net Inc. for the permanent provision of an Electronic Tracking Services (ETS) within the rules and provisions of the FCC. The Dallas Police Department as well as the Metroplex surrounding Dallas needs the technology that the Tracking system provides. This vital law enforcement monitoring and tracking service enables us to promote safety of life and property through the expanded use of radio communications for crime control and prevention.

We became involved with ETS and the Electronic Tracking System in August 1987 and found it to be a valuable tool in law enforcement. Specifically, our organization has had experience with ETS in the area of financial institution robberies, where the Electronic Tracking System has resulted in the apprehension and subsequent conviction of the felony robbery suspect, under circumstances that typically would result in the robber getting away.

The Electronic Tracking System also allows the user police departments the advantage of making the arrest away from the location of the offense. This has led to increased personal safety for financial institution customers and employees, police officers, and the citizens of our community.

A specific case where the Electronic Tracking System was particularly useful to us was the arrest of Mark Reeves aka: "The Dapper Bandit" who had been robbing banks in Texas for nine (9) years. In addition, in the last eighteen (18) months we have recovered over \$120,000.00 taken from financial institutions that would not have been recovered without ETS.

Page Two (2)
Federal Communications Commission
1919 M. Street NW, Room #222
Washington, D.C. 20036

ATTN: OFFICE OF THE SECRETARY: DONNA SEARCY

REFERENCE: IN THE MATTER OF PRO NET INC. PETITION FOR RULE MAKING FOR
THE PERMANENT PROVISION OF ELECTRONIC TRACKING SERVICES

If you need additional information from me, do not hesitate to call. The liaison officer for the Dallas Police Department for this project is Sergeant James W. Andrews, phone 214-670-5146.

Sincerely,

WILLIAM M. RATHBURN
CHIEF OF POLICE



Ray Hawkins
Deputy Chief of Police
Crimes Against Persons Bureau

ma

0003M



CITY OF DALLAS

April 20, 1990

Federal Communications Commission
1919 M Street NW Room #222
Washington, D.C. 20036

ATTN: OFFICE OF THE SECRETARY: DONNA SEARCY

Reference: In the matter of Part 90 of the Commission's Rules to Provide
for the Use of the 220222 MHz Band by the Private Land Mobile
Radio Services

PR DK. NO. 89552

Dear Sirs:

The Dallas Police Departments wishes to voice its support of the comments
of Electronic Tracking Systems Inc. with regards to rule-making described
in the reference above.

We became involved with ETS and the Electronic Tracking System in August
1987 and have found it to be a valuable tool in critical law enforcement
areas. Specifically, our organization has had experience with ETS in the
area of financial institution robbery, where the Electronic Tracking System
has resulted in robbery felon apprehension and subsequent conviction under
circumstances that typically would have resulted in the robber getting away.
This has led to increased personal safety for financial institution customers
and employees, as well as the citizens of our community.

A specific case where the Electronic Tracking System was particularly useful
to us was the arrest of Mark Reeves aka the Dapper Bandit who had been robbing
banks in Texas for nine (9) years. If you need additional information from
me, please call at 214-670-5146.

Sincerely,

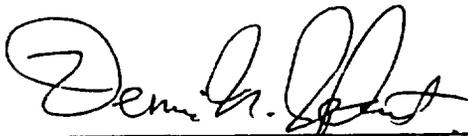
MACK VINES
CHIEF OF POLICE


Ray Hawkins
Deputy Chief of Police
Crimes Against Persons Division
Criminal Investigation Bureau

JWA:ma

The Department encourages the FCC to grant the Frequency request of ETS as their technology is invaluable to law enforcement. If you need additional information, call me at (714) 722-6714 between 10AM and 5PM PDT.

Sincerely;

A handwritten signature in black ink, appearing to read "Dennis N. Jefcoat". The signature is written in a cursive style with a large initial "D".

Dennis N. Jefcoat
Senior Police Officer
ETS Co-ordinator
Costa Mesa Police Department.

MAYOR
Sam P. Burford, Jr.

MAYOR PRO TEM
Robert O. Mullins

COUNCIL MEMBERS
Wade C. Smith
Waldo S. Powell
Gordon G. Tucker
Iris Irion Worsham

TOWN ATTORNEY
H. Lou Morrison, Jr.

TOWN JUDGE
Pat A. Robertson

THE TOWN OF

Highland Park

TEXAS

4700 DREXEL DRIVE, HIGHLAND PARK, TEXAS 75205
Telephone (214) 521-4161

TOWN ADMINISTRATOR
L.A. (George) Patterson

TOWN ENGINEER
Jim Dower

TOWN SECRETARY
James Fisher

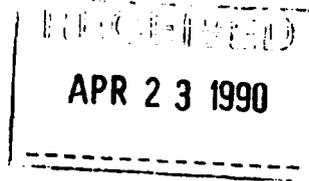
DIRECTOR OF
PUBLIC SAFETY
Darrell Fant

DIRECTOR OF FINANCE
Bill Pollock

DIRECTOR PARKS/SANITATION
Ronnie Brown

April 4, 1990

Federal Communications Commission
1919 M Street NW Rm. 222
Washington, D.C. 20036



ATTN: Office of the Secretary - Donna Searcy

Reference: In the matter of Part 90 of the Commissions Rules to provide for the use of the 220-222 MHz Band by the Private Land Mobile Radio Services.

PR DK. NO. 89-552

Dear Sirs:

The Highland Park D.P.S. wishes to voice its support of the comments of Electronic Tracking Systems Inc. with regards to rule-making described in the reference above.

The Highland Park Department of Public Safety became involved with Electronic Tracking Systems Inc. in 1987. We believe that this relationship has been extremely valuable in terms of Law Enforcement applications. Since the initial inception of the system the Highland Park Department of Public Safety has used the system three times in the apprehension of robbery suspects and 29 times in the capture and conviction of burglary suspects. In every case the suspect has been captured away from the location of the offense and in possession of the stolen property. This combination of events has led to a safe environment for the capture, a 99% conviction rate in court and a recovery of \$60,000.00 worth of stolen property.

The Highland Park Department of Public Safety is extremely interested in the further development of the ETS system and a possible expansion of its Law Enforcement applications.

Attached is a history of the Highland Park Department of Public Safety's use of the ETS system. If you need additional information from me, please call at 214-521-4161.

Sincerely,

Captain Bobby Richardson
Communications Systems Supervisor



APR 23 1990

U.S. Department of Justice

Federal Bureau of Investigation

In Reply, Please Refer to
File No.

1801 N. Lamar St., Suite 300
Dallas, Texas 75202
April 19, 1990

Federal Communications Commission
Room 222
1919 M Street, NW
Washington, D.C. 20036

Attention: Donna Searcy
Office of the Secretary

RE: In The Matter of Part 90 of The Commission's Rules
to Provide for the Use of the 220-222 MHz Band by the
Private Land Mobile Radio Services

PR DK. NO. 89-552

Dear Sirs:

The Federal Bureau of Investigation (FBI), Dallas, Texas, has been contacted by Electronic Tracking Systems Inc. (ETSI), based in Dallas, Texas requesting FBI support for ETSI's application for additional frequency spectrum.

This communication is in support of not ETSI or any other individual company, per se, but instead for whatever improvements or expansions might be made in electronic currency tracking systems, currently marketed by ETSI under the name ProNet Tracking Systems.

The FBI is aware this electronic tracking system has been installed in several cities in the United States, and is further aware the system has very significantly increased the number of apprehensions in robbery situations wherein electronically equipped currency packets were taken in robberies. The Dallas FBI, for purposes of illustration, in concert with the Dallas Police Department, Texas Rangers, and numerous other law enforcement agencies, vigorously sought the apprehension of an extremely

proficient armed robber who victimized Texas banks over a ten year period commencing in 1978. The above named law enforcement agencies, after other conventional investigative approaches had produced no positive results, conceived the idea of introducing the currency tracking system to the banks located in the particular area of Dallas normally targeted by the bandit. The installation was accomplished and the bandit was arrested within months of the installation as a direct result of the system's installation. He had, prior to his capture, successfully obtained in excess of \$750,000 from Texas banking institutions by means of 27 bank robberies and bank extortions.

The FBI supports ETSI's application for frequency band expansion insofar as such expansion would facilitate expanded use of the currency tracking system in robbery and/or extortion applications.

Sincerely,

Bobby R. Gillham,
Special Agent in Charge

cc: Electronic Tracking Systems Inc.
600 Data Drive, Suite 100
Plano, Texas 75075

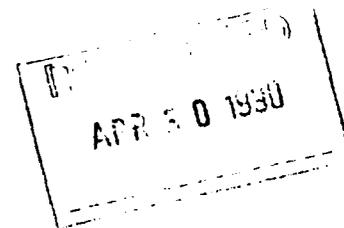
ELECTRONIC TRACKING SYSTEMS (ETS)
HIGHLAND PARK DEPT. OF PUBLIC SAFETY - SUMMARY

NO.	DATE	LOCATION	Suspect Description	Age	Property Recovery	Arrest Location	Case Disposition
01	11-07-88 4:30 AM	3400 blk. Gillon	No suspect information	N/A	none	No arrest made	N / A
02	02-18-89 1:00 AM	4600 Abbott Ave	1 W / M	24	Passport	3600 Beverly Drive	Pled for 12 years TDC
03	04-14-89 8:20 PM	4600 Bowser Ave	1 B / M	38	VCR	4600 Lemmon Ave	Pled for 5 years Probation
04	04-29-89 3:15 AM	4800 Abbott Ave	1 W / M	25	Escort	5400 Cedar Springs	Pled for 5 years Probation
05	05-31-89 4:15 PM	4800 Westside Dr.	1 B / M	N/A	Passport	No arrest made	Property recovered abandoned in Apt. Complex
06	06-03-89 1:12 AM	5100 Westside Dr.	1 W / M	22	Passport	5500 Glenwick	Indictment made no case disposition
07	06-20-89 11:23 PM	4600 Bowser Ave.	Unknown	N/A	Escort	No arrest made	Property recovered abandoned in roadway
08	07-19-89 9:42 PM	5800 Golf Drive	1 W / M	N/A	Escort	No arrest made	Property recovered 3901 Bryn Mawr
09	07-23-89 9:31 PM	5800 High School	1 W / M	31	Passport VCR	1800 N. Central	Indictment made no case disposition
10	07-29-89 4:41 PM	5500 Golf Drive	1 W / M	18	Escort	3400 Asbury	Indictment made no case disposition
11	08-09-89 5:48 AM	5000 Sewanee Ave.	2 L / M	18 16	Passport	5300 Ellsworth	Indictment made no case disposition
12	08-16-89 1:52 AM	4200 Westway	2 W / M	18 16	Passport VCR	4500 Rheims Place	pled 10 years referred to juvenile court
13	08-21-89 10:30 PM	4400 Westway Ave.	3 W / M	37 22 16	Escort	7816 Purdue	Indictment made no case disposition
14	08-23-89 2:53 AM	4600 Westside Dr.	2 W / M	23 21	Escort	4679 Westside Dr.	Indictment made no case disposition
15	09-06-89 10:17 PM	5700 Lomo Alto University Park	1 W / M	27	Escort UPPD	300 Exposition	Indictment made no case disposition
16	09-10-89 1:57 PM	4100 Lomo Alto	1 B / M	43	Escort	4605 Bowser	Indictment made no case disposition
17	09-23-89 3:50 PM	Beltline and Plano Road Tom Thumb Store	1 B / M	34	\$3000.00	1300 N. Stemmons	Indictment made no case disposition
18	09-27-89 8:58 PM	3500 Lexington	2 B / M	26 26	Passport	5000 Preston Road	Indictment made 5 Year Adjudicated Probation
19	10-01-89 7:47 PM	3500 Lexington	2 W / M	16 16	Escort	3600 Lexington	Referred to juvenile court
20	10-18-89 2:49 AM	4600 Abbott Ave.	1 W / M	24	Escort	3800 Beverly Dr.	Indictment made no case disposition

ELECTRONIC TRACKING SYSTEMS (ETS)
HIGHLAND PARK DEPT. OF PUBLIC SAFETY - SUMMARY

NO.	DATE	LOCATION	Suspect Description	Age	Property Recovery	Arrest Location	Case Disposition
21	10-22-89 2:49 AM	5400 Sewanee Ave			Escort		Property Recovery only SMU Campus
22	11-11-89 9:45 PM	4600 Bowser Ave.	2 B / M	20 22	Passport	333 Jefferson Blvd	Indictment made no case disposition
23	11-16-89	4600 Arcady	1 L / M 1 M / M	33 34	Escort	3900 Lemmon Ave	Indictment made no case disposition
24	11-19-89	5100 Westside Dr.	1 L / M	22	Escort	5122 Bowser Ave	Indictment made no case disposition
25	11-19-89	5000 Abbott Ave			Escort		Property Recovery only S. Alley 3300 Princeton
26	11-29-89	4500 Westside Dr	1 B / M	35	Escort	Wheeler at Bowser	Indictment made no case disposition
27	01-28-90	4300 Livingston	1 M / M	16	Escort	4500 Edmondson	Referred to Juvenile court
28	02-27-90	4600 Westside Dr.	1 B / M	25	Escort	4503 Lake St.	Indictment made no case disposition
29	04-11-90	4800 Lemmon Ave.	1 L / M	20	Escort	4600 Lemmon Ave.	Indictment Pending
30	04-12-90	4820 Lemmon Ave	2 B / M	24 25	Escort	4600 Lemmon Ave.	Indictment Pending

SunbeltSavings FSB



April 25, 1990

Federal Communications Commission
1919 M. Street NW, Room 222
Washington, D.C. 20036

Attn: Office of the Secretary: Donna Searcy

Reference: In the matter of part 90 of the Commission's Rules to provide for the use of the 220-222 MHz band by the Private Land Mobile Radio Services:

PR DK No. 89-552

Dear Sir or Madam:

On behalf of Sunbelt Savings, FSB I wish to voice our support of the comments of Electronic Tracking Systems Inc., (ETS) with regard to rule-making described in the above reference.

Sunbelt Savings, FSB has been involved with ETS and the Electronic Tracking System for over one (1) year and has found it to be a valuable asset in critical law enforcement areas. Specifically, our organization has had experience with ETS in the area of financial institution robbery. Although we have never experienced an actual robbery in which the suspect's apprehension and subsequent conviction were directly attributable to the ETS system, I am personally aware of other institutions who have experienced such incidents. Additionally, I would like to go on record as a supporter of the ETS System to the degree that all of Sunbelt's branches which are located in an area served by the ETS System have had the system installed. Furthermore, I believe that if the ETS service area can be broadened to encompass additional branches and banks, a significant overall decline in the rate of robberies at financial institutions could follow. If and when a decline in robberies of financial institutions occurs it will obviously provide increased personal safety for financial institution customers and employees, as well as all the citizens of our community.

Thank you for your courtesy in allowing me to provide you with this letter of support for Electronic Tracking Systems, Inc.

Page 2
D. Searcy
4-15-90

Additionally, if there is any further information concerning this matter that I may provide to you; please do not hesitate to contact me at (214) 717-8700.

Sincerely,



Monte C. Dunn
AVP/Director
Corporate Security
Sunbelt Savings, FSB

MCD/td

cc: Harry Currie



April 23, 1990

Federal Communications Commission
1919 M Street, N. W.
Room 222
Washington, D. C. 20036

ATTN: Office of the Secretary - Donna Searcy

Reference: In the matter of Part 90 of the Commission's Rules
to Provide for the use of the 220-222 MHz Band by
the Private Land Mobile Radio Services

PR DK. No. 89-552

Dear Ms. Searcy,

The North Texas Regional Clearing House Association (NTRCHA), a trade association of sixty-seven financial institutions in the Dallas/Fort Worth metroplex, wishes to voice support of comments from Electronic Tracking Systems, Inc. with regard to rule-making described in the reference above.

NTRCHA members have used the Electronic Tracking System for more than three years and find it to be an important and successful tool in reducing bank robberies and in assisting law enforcement agencies in the speedy recovery of stolen property. Our members are realizing an average mean time from robbery to capture of twelve minutes. No other methods or options have been as effective or successful.

Because of the ETS System, our members are not only satisfied with the recovery of stolen money but, more importantly, they are pleased with the apprehension, conviction and incarceration of the felons. NTRCHA members have realized a distinct decline in the robbery rate wherever the system is employed. Additionally, the personal safety risk of both employees and customers is reduced.

Federal Communications Commission
Page #2

Due to the system's success, the NTRCHA has been instrumental in the expansion of coverage to the Austin and Houston areas, and expect the San Antonio banks to initiate the Electronic Tracking System later this year. Currently, almost 2,000 devices are installed in the three Texas cities.

Two specific cases where the system has been instrumental in apprehensions are: 1) in Dallas, the capture of the "Dapper Bandit" who now resides in a federal prison, and 2) in Austin where, after a robbery, the robber was tracked approximately 100 miles by helicopter and captured in Waco, Texas.

We strongly urge you to decide in favor of the Electronic Tracking System, Inc. request. Should you have questions or need additional information regarding our use and application of the system, please contact me at 214/954-0585. Thank you for your consideration of this request.

Sincerely,



Thomas J. Patrick
Executive Director

TJP/m

cc: C. Michael Iles - ETS

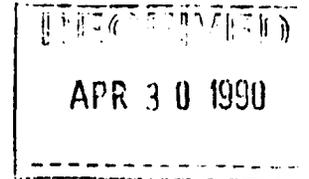


POLICE DEPARTMENT

237 WEST COMMONWEALTH AVENUE • FULLERTON, CALIFORNIA 92632 • PH. (714) 738-6800

PHILIP A. GOEHRING CHIEF OF POLICE

April 23, 1990



REFERENCE TO

Federal Communications Commission
1919 M Street NW Rm. 222
Washington, D.C. 20036

ATTN: Office of the Secretary: Donna Searcy

Reference: In the matter of Part 90 of the Commission's Rules to Provide for the Use of the 220-222 MHz Band by the Private Land Mobile Radio Services

PR DK. NO. 89-552

Dear Sirs:

We wish to voice its support of the comments of Electronic Tracking Systems Inc. with regards to rule-making described in the reference above.

We became involved with ETS and the Electronic Tracking System in the City of Fullerton and have found it to be a valuable tool in critical law enforcement areas. Specifically, our organization has had experience with ETS in the area of financial institution robbery, where the Electronic Tracking System has resulted in robbery felon apprehension and subsequent conviction under circumstances that typically would have resulted in the robber getting away. Over time, we have experienced an overall decline in our robbery rate, and this has led to increased personal safety for financial institution customers and employees, as well as the citizens of our community.

A specific case where the Electronic Tracking System was particularly useful to us was the recent armed robbery of a Fullerton bank where the suspects were taken into custody only minutes after the robbery, after the ETS device was activated. If you need additional information from me, please call at (714) 738-6840.

Very truly yours,

PHILIP A. GOEHRING
Chief of Police

A handwritten signature in cursive script, appearing to read "L.R. DeVore".

CAPTAIN L.R. DeVORE
Commander, Investigation Division

LRD:kyt

bc: Electronic Tracking Systems Inc. ✓



APR 30 1990

CITY OF SIGNAL HILL

1800 E. Hill Street • Signal Hill, California 90806 • (213) 426-7333 • FAX (213) 427-3276

April 23, 1990

Federal Communications Commission
1919 M Street NW, Room 222
Washington, D.C. 20036

Attention: Office of the Secretary
Donna Searcy

Reference: In the matter of Part 90 of the Commission's Rules
to Provide for the Use of the 220-222 MHz Band by
the Private Land Mobile Radio Services

FR DK. NO. 89-552

Dear Sirs:

We wish to voice our support of the Electronic Tracking Systems, Inc. regarding rules-making as described in the reference above.

We became involved with ETS and the Electronic Tracking System in November of 1989 and have found it to be a valuable tool in critical law enforcement areas. Specifically, our organization anticipates that future experience with ETS in the area of financial institution robberies, will result in robbery felon apprehensions and subsequent convictions under circumstances that typically would have resulted in the robber getting away. Over time, we are certain that our agency will experience an overall decline in our robbery rate, and will lead to increased personal safety for financial institution customers and employees, as well as the citizens of our community.

Sincerely,


Michael R. McCrary
Chief of Police

SIGNAL HILL POLICE DEPARTMENT



CITY OF ANAHEIM, CALIFORNIA

Police Department

April 18, 1990

APR 23 1990

Federal Communications Commission
1919 M. Street NW Rm. 222
Washington, D.C. 20036

ATTN: Office of the Secretary - Donna Searcy

Reference: In the matter of Part 90 of the Commission's Rules to Provide for the Use of the 220-222 MHz Band by the Private Land Mobile Radio Services.

PR DK. NO. 89-552

Gentlemen:

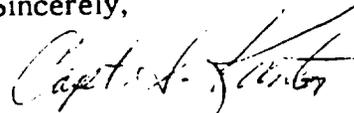
The Anaheim Police Department wishes to voice its support for Electronic Tracking Systems, Inc. (E.T.S.) with regards to rulemaking described in the reference above.

We became involved with E.T.S. and the Electronic Tracking System in 1989, and have found it to be a valuable tool in critical law enforcement areas. Specifically, our organization has had experience with E.T.S. in the area of robberies of Anaheim financial institutions, where the Electronic Tracking System has resulted in the apprehension and subsequent conviction of felony robbery suspects under circumstances that would have typically resulted in the escape of the suspect. Historically; police agencies using E.T.S. equipment have experienced an overall decline in the robbery rate, leading to increased personal safety for the citizens who live and/or work in the community.

A specific case where the Electronic Tracking System was particularly useful to us occurred on December 6, 1989, when two armed suspects robbed a local Bank of America branch. The suspects were able to obtain the money from the bank and flee prior to the arrival of police officers. The suspects drove to a garage in an apartment complex a short distance away and concealed both themselves and their vehicle. Fortunately, the bank was equipped with E.T.S. equipment, and officers were able to quickly locate and apprehend the suspects. Due, primarily to the E.T.S. equipment, we were able to recover the stolen money, weapons and other evidence.

If you need additional information or if we can be of further assistance to you in this matter, please do not hesitate to call me at (714) 999-1923, or Lieutenant Marc Hedgpeth, Commander of the Crimes Person Bureau, at (714) 999-1927.

Sincerely,



CAPTAIN STANLEY S. KANTOR
ACTING CHIEF OF POLICE

cc: C. Michael Iles, ProNet Tracking Systems

D3507S/jn



CITY of

La Habra



POLICE DEPARTMENT
150 N. EUCLID STREET
LA HABRA, CALIFORNIA 90631
(213) 905-9750
(714) 526-2227

April 23, 1990

Federal Communications Commission
1919 M Street N.W., Rm. 222
Washington, D.C. 20036

Attn: Office of the Secretary: Donna Searcy

Reference: In the matter of Part 90 of the Commission's Rules to Provide for the Use of the 220-222 MHz Band by the Private Land Mobile Radio Services.

PR DK. No. 89-552

Dear Sirs:

We wish to voice our support for the Electronic Tracking Systems Inc. with regards to the above described matter.

We became involved with E.T.S. and the Electronic Tracking System in 1989 and have found it to be a valuable tool to Law Enforcement. Specifically, our agency has utilized ETS in both financial institutions and large commercial retail operations to combat robberies. The Electronic Tracking System has resulted in felony robbery apprehensions and recovery of property under circumstances that typically would have resulted in the suspect(s) evading arrest. We foresee a decline in the robbery rate which would make for a safer community.

A specific case where the Electronic Tracking System was particularly useful to us was the Robinson's jewelry robbery where five(5) felony suspects were arrested for robbery and approximately \$500,000 in stolen jewelry was recovered in our city. If you need any further information, please feel free to contact me at (213) 905-9751.

Very truly yours,

RONALD D. MEEHAN
Chief of Police

RDM/mh1

City of Seal Beach

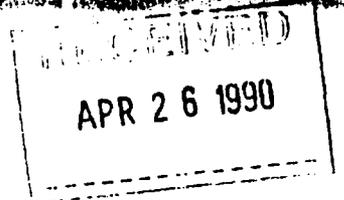
POLICE DEPARTMENT



811 SEAL BEACH BOULEVARD
SEAL BEACH, CALIFORNIA 90740-5669
TELEPHONE (714) 826-3636 / (714) 826-3636

April 23, 1990

Federal Communications Commission
1919 M Street NW Rm. 222
Washington, D.C. 20036



ATTN: Office of the Secretary: Donna Searcy

Reference: In the matter of Part 90 of the Commission's Rules to Provide for the Use of the 220-222 MHz Band by the Private Land Mobile Radio Services

PR DK. NO. 89-552

Dear Sirs:

We wish to voice its support of the comments of Electronic Tracking Systems Inc. with regards to rule-making described in the reference above.

We became involved with ETS and the Electronic Tracking System in October, 1990 and have found it to be a valuable tool in critical law enforcement areas. Specifically, our organization has had experience with ETS in the area of financial institution robbery, where the Electronic Tracking System has resulted in robbery felon apprehension and subsequent conviction under circumstances that typically would have resulted in the robber getting away. Over time, we have experienced an overall decline in our robbery rate, and this has led to increased personal safety for financial institution customers and employees, as well as the citizens of our community.

A specific case where the Electronic Tracking System was particularly useful to us was 4/16/90, 11-2039, a pursuit into L.A. If you need additional information from me, please call at (213) 431-2541.

Sincerely,

W.D. STEARNS
Chief of Police

LT. David Van Holt
Investigations Bureau Commander



MERCURY SAVINGS *and loan association*

April 24, 1990

EXECUTIVE OFFICES
7812 Edinger Ave., P.O. Box 1010
Huntington Beach, Calif. 92647
Telefax (714) 848-9606 (Group II & III)

Federal Communications Commission
1919 M Street NW Room 222
Washington, D.C. 20036

Attn: Office of the Secretary: Donna Searcy

Reference: In the matter of Part 90 of the Commission's Rules to
Provide for the Use of the 220-222 MHz Band by the Pri-
vate Land Mobile Radio Services

PR DK. NO. 89-552

Dear Sir or Madam:

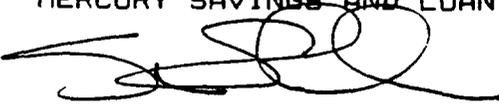
Once in a great while a product comes along that demonstrates such tremendous results and benefits the public interest to the extent that support is necessary by the companies who use such a product. Electronic Tracking Systems Inc. has such a product in its ability to deter and capture bank robbers in a significant number of occurrences. In fact, the government, in many instances, now subsidizes bank robbery losses as a result of the significant number of bank seizures in recent months.

We wish to voice its support of the comments of Electronic Tracking Systems, Inc. with regard to the rule-making described in the reference above.

Mercury became involved with Electronic Tracking Systems Inc. in late 1989 and feels it is a superior tool to other products designed to assist law enforcement in the battle against bank robbery. Having been in law enforcement for 11 years and 6 years in the financial banking industry I submit to you my experience and expertise in this industry and my recommendation that ETS be given the necessary channels needed to operate effectively.

Cordially,

MERCURY SAVINGS AND LOAN ASSOCIATION


Steven R. Shulman, Vice President
Director of Security

Telephone (714) 842-9333





CITY OF
PORTLAND, OREGON
BUREAU OF POLICE

J.E. BUD CLARK, MAYOR
Richard D. Walker, Chief of Police
1111 S.W. 2nd Avenue
Portland, OR 97204

August 1, 1989

Harry Curry
Electronic Tracking Systems
600 Data Drive, Suite 100
Plano, Texas 75075

Sir:

As you are aware, over the last few years Portland, Oregon has experienced an alarming increase in the bank robbery rate. In fact, as you recall, we contacted you and your firm in 1983 following which you demonstrated your tracking system to law enforcement and financial people in Portland. That attempt did not gather enough support to bring your system to our city.

I don't know if you are aware of it, but Portland, in 1988 (see attached) led the nation's cities in bank robberies per capita. I have contacted several representatives of other departments in cities your system is currently serving and they all say it is the one main reason for their consistent decline in bank robberies since its installation.

I have been authorized by my Captain and the Deputy Chief of Investigation to request that your firm re-survey Portland financial institutions and determine if it is possible for Portland to be scheduled as your very next installation.

Please contact me if there is anything I can do to assure Portland gets positive consideration in this matter by your firm.

It has been a pleasure dealing with you and others with E.T.S. in the past and I look forward to future contacts.

Yours very truly,

Detective Robert D. Benson
Detective Division
Robbery Detail

RDB/dg



POLICE DEPARTMENT

City of Reno

POST OFFICE BOX 1900 RENO, NEVADA 89505 (702) 334-2100

R. V. BRADSHAW
Chief of Police

July 18, 1991

Federal Communications Commission
Washington, D.C.

Gentlemen:

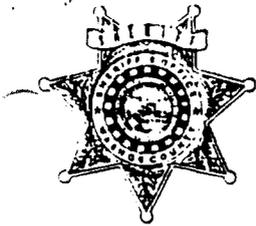
The Reno Police Department entered into a contract with ProNet Tracing Systems in 1988 to provide equipment and support for a electronic tracking system. Since that time, our agency has enjoyed a substantial increase in clearance rates for bank robberies, primarily based on the success of the system. We find the equipment has been reliable and of consistent use to uniformed police officers in tracking and capturing bank robbers and criminals involved in other types of robbery crimes.

It is anticipated that the contract with ProNet will be maintained in the future. We recommend the use of the ProNet (or similar) systems to any law enforcement agency.

Sincerely,

Richard Kirkland
Interim Chief of Police

RK/mj



Serving Since 1861

WASHOE COUNTY SHERIFF'S OFFICE

VINCENT G. SWINNEY
Sheriff

911 PARR BOULEVARD
RENO, NEVADA 89512 - 1000
TELEPHONE: (Area 702) 328-3000

April 23, 1990

APR 23 1990

Federal Communications Commission
1919 M Street NW Room 222
Washington, D.C. 20036

Attention: Office of the Secretary: Donna Searcy

Reference: In the matter of part 90 of the Commission's Rules to
Provide for the Use of the 220-222 MHz Band by the
Private Land Mobile Radio Services

PR DK. NO. 89-552

Dear Sirs:

We wish to voice support of the comments of Electronic Tracking Systems, Inc., with regards to rule-making described in the reference above.

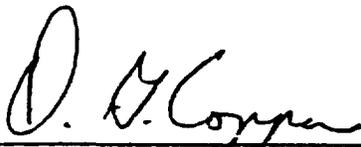
We became involved with ETS and the Electronic Tracking System in 1989 and have found it to be a valuable tool in critical law enforcement areas. Specifically, our organization has had experience with ETS in the area of financial institution robbery, where the Electronic Tracking System has resulted in robbery felon apprehension and subsequent conviction under circumstances that typically would have resulted in the robber getting away. Over time, we have experienced an overall decline in our robbery rate, and this has led to increased personal safety for financial institution customers and employees, as well as the citizens of our community.

The Washoe County Sheriff's Office, the Reno and Sparks Police Departments jointly utilized the Electronic Tracking System. Through this system, we assisted the Sparks Police Department in the apprehension and arrest of a subject who perpetrated a robbery of a credit union in that jurisdiction. The equipment permitted our units to home in on the suspect's residence. Without such equipment, capture of the suspect and recovery of the property would not have been possible.

Page -2-

The Washoe County Sheriff's Office wholeheartedly supports the Electronic Tracking System.

Sincerely,

A handwritten signature in cursive script, appearing to read "D. G. Coppa".

D.G. COPPA, UNDERSHERIFF

JGC/st



CITY OF HOUSTON

Telephone 713/247-1000

61 Rensler Street • Houston, Texas 77002

Kathryn J. Whitmire, Mayor

CITY COUNCIL MEMBERS: Larry McFalls • Ernest McBrown, Sr. • Vince Ryan • Shelia J. Lee • Frank G. Monahan • John G. Goodner • Chalm Harkins
Dale M. Gorenzki • Ben T. Soyak • Beverly Clark • Beverly Frisby • Jim Greenwood • Alfred J. Galloway • Judson Sabbe, Jr. • CITY CONTROLLER: George Swanson

HOUSTON POLICE DEPARTMENT
Elizabeth M. Watson
Chief of Police



July 24, 1991

Office of the Director
Federal Communications Commission
1919 M Street, N. W.
Washington, D. C. 20554

Dear Sirs:

Approximately two years ago, the Houston Police Department was approached by the local banking community and *ProNet Tracking Systems* and was asked to support their joint efforts in increasing the capture rate of bank robbery suspects. The application proposed (and implemented) would employ state-of-the-art computer and communications technology to track and capture felony robbery suspects with a high degree of accuracy.

Since that time, the *ProNet Tracking Systems* has proved its effectiveness several times (most recently this month). The system is clearly a sound and effective application of communications technology supporting public safety, law enforcement and private sector interests.

Through this correspondence, the Houston Police Department solicits your favorable consideration in licensing electronic tracking systems frequencies for public safety/law enforcement applications. Should you require additional information or supporting documentation, please feel free to contact us directly.

Sincerely,

Elizabeth M. Watson
Chief of Police

EMW/wcw





INTERNATIONAL UNION OF POLICE ASSOCIATIONS AFL-CIO

THE ONLY UNION FOR LAW ENFORCEMENT OFFICERS

- International Headquarters • 1016 Duke Street • Alexandria, Virginia 22314 • (703) 549-7473
 West Coast Regional Office • 175 E. Olive Ave. • Suite 400 • Burbank, CA 91502 • (818) 841-5426

ROBERT B. KLIESMET
International President

AL ANGELE
International
Secretary-Treasurer

SAM CABRAL
International Vice President

April 26, 1990

Ms. Donna Searcy
Office of the Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20036

RECEIVED

APR 26 1990

PR. DK. NO. 89-552
RM 6595

Federal Communications Commission
Office of the Secretary

Dear Ms. Searcy:

On behalf of the International Union of Police Associations (AFL-CIO), this letter is submitted in support of the spectrum plan proposed by Electronic Tracking Systems, Inc. (ETS) in PR. DK. NO. 89-552. The union is the official representative of police service personnel from all regions of the United States. As such, it has an interest in assuring that the FCC adopts rules for the 220-222 MHz band that will meet important police needs, while helping to protect the lives of law enforcement personnel.

As proposed by ETS, ten discrete 5 KHz frequencies set aside exclusively for police use in criminal tracking operations will assist police departments in combatting violent crime across the nation. In addition, ten discrete 5 KHz frequencies for law enforcement tracking shared with federal agencies, such as the Federal Bureau of Investigation, and the Drug Enforcement Agency, will help local and state police involved in joint operations. Perhaps, most significantly, use of the 220-222 MHz spectrum for law enforcement tracking operations will be an important tool in the nation's war on drugs.

In sum, there can be no more important use for this spectrum than law enforcement tracking needs. Therefore, we urge the FCC to make the requested frequencies available on a nationwide basis to law enforcement personnel.

Sincerely,

Robert B. Kliesmet
International President

RBK/dmk



U.S. Department of Justice
Federal Bureau of Investigation

Washington, D.C. 20535

April 30, 1990

Mr. Albert J. Catalano
Principal
Murphy & Demory, Ltd.
Suite 725
2300 N Street, N.W.
Washington, D.C. 20037

Dear Mr. Catalano:

I enjoyed meeting with you and Mr. Currie in regard to allocation of channels in the 220-222 MHz band for law enforcement tracking systems. As you indicated, the Electronic Tracking Systems, Inc. tracking system has proven to be very beneficial. Although the FBI has no immediate plans to purchase the system, we will continue cooperative law enforcement operations with local police departments using the system.

The Federal Government provides comments on frequency allocation matters to the FCC through the National Telecommunications and Information Administration (NTIA). Therefore the FBI will recommend NTIA propose that 10 narrowband simplex channels be made available for joint Federal and local authorities and will also urge NTIA support of your request for 10 channels for local law enforcement use.

The FBI is investigating the feasibility of using the 220-222 MHz band for future tracking requirements. If the study indicates a requirement, the FBI will propose the NTIA allocate exclusive Government channels to support tracking systems offered by any manufacturer.

Sincerely yours,

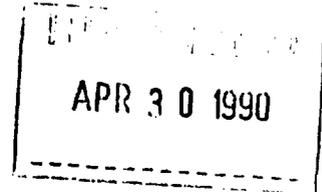
Kier T. Boyd
Deputy Assistant Director
Technical Services Division

**First
Interstate
Bank**

First Interstate Bank
of California
Bank Security Department
1200 West Seventh Street
Los Angeles, CA 90017
213 239-4817

Keith D. Marshall
Vice President
Deputy Director of Security

April 24, 1990



Ms. Donna Searcy
Office of the Secretary
FEDERAL COMMUNICATIONS COMMISSION
1919 "M" Street, Room 222
Washington, D.C. 20036

RE: In the matter of Part 90 of the Commission's
Rules to Provide for the Use of the 220-222
MHz Band by the Private Land Mobile Radio
Services - PR DK. NO. 89-552

Dear Ms. Searcy:

First Interstate Bank supports the application by
Electronic Tracking Systems, Inc., Plano, Texas for
additional frequency spectrum.

We have utilized the electronic tracking equipment since
1984 and have found it to be a valuable tool in
apprehending bank robbers. In addition, it has proven
extremely valuable in the recovery of stolen money.

We are currently utilizing the ETS products in our branch
offices in San Francisco, Sacramento and Orange County. We
are expanding the use to include the Los Angeles
metropolitan area. The equipment will be used in
approximately 100 of our branch offices.

We look forward to continued use of this equipment and new
products which ETS will develop utilizing the additional
frequency spectrum.

Very truly yours,

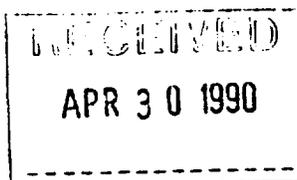


KDM:drm

cc: C. Michael Iles
Director of Marketing
Electronic Tracking Systems, Inc.
P.O. Box 260409
Plano, Texas 75026-0409



Century Federal Savings
AND LOAN ASSOCIATION



April 23, 1990

Federal Communications Commission
1919 M Street NW Rm. 222
Washington, D.C. 20036

ATTN: Office of the Secretary: Donna Searcy

Reference: In the matter of Part 90 of the Commission's
Rules to Provide for the Use of the 220-222 MHz Band by the
Private Land Mobile Radio Services

PR DK. NO. 89-552

Dear Sirs:

Century Federal Savings supports the position of Electronic
Tracking Systems, Inc. with regards to the rule making
described in the reference above.

We have recently had the Electronic Tracking System
installed in three of our branches. We would have had them
much earlier, but geographically they were not available to
us. Soon we will install three additional branches.

In 21 years in law enforcement and 15 years in financial
institution security, I have never seen a more positive
method of safeguarding lives and property than the
application of the Electronic Tracking System. When we can
recover stolen property and be assured that the perpetrators
will not soon be repeating their life threatening actions on
our employees and the public we have accomplished a great
deal.

When considering the allocation of additional channels, I
believe that public safety must be a priority.

Sincerely.

Arnold E. Nielsen
Vice President
Director of Security



Safe for Customers & Employees



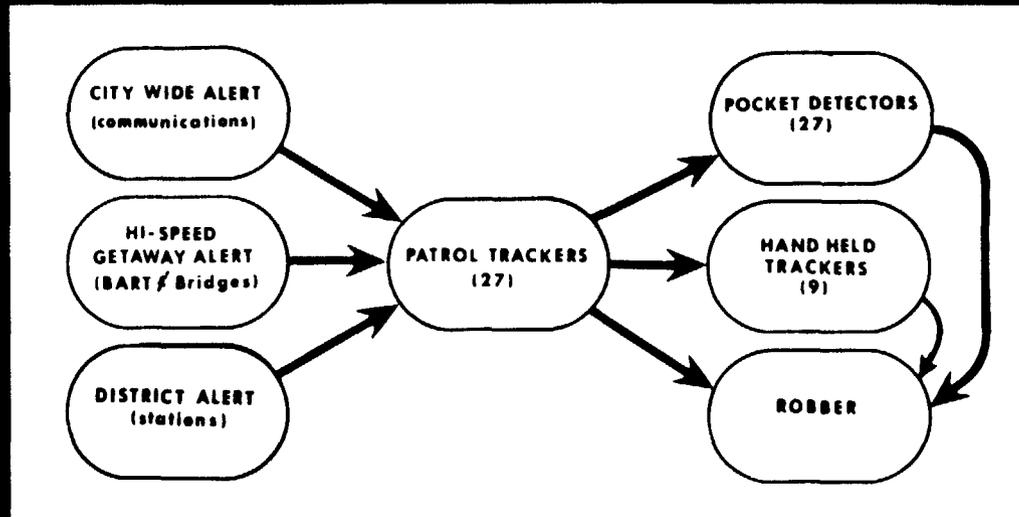
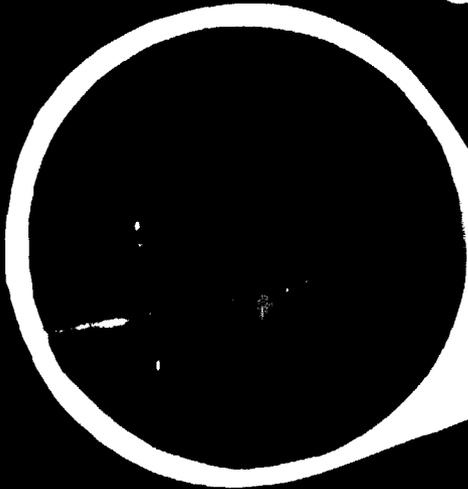


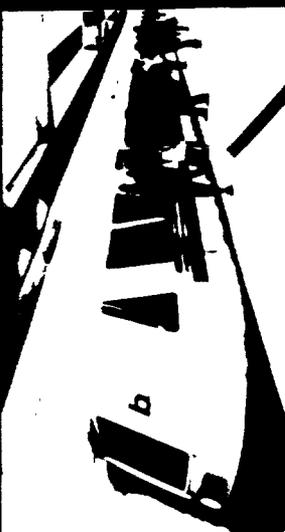
11:43

Jellyville
Parker Co
S E 30
Cannon
Oak Hill
Iron Mine
City Hill
Wood Post



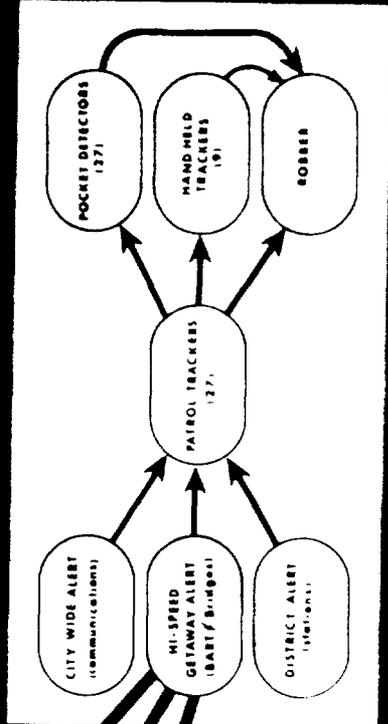
District Stations



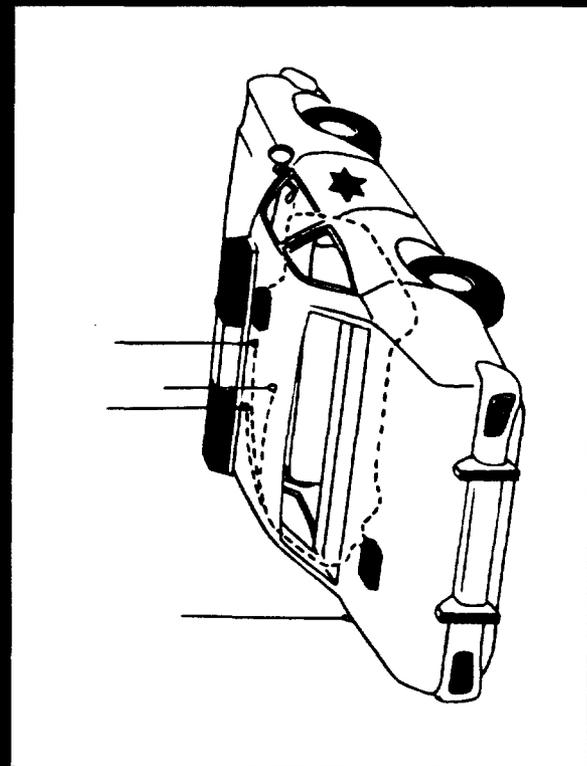


TI-ETS

Hi-Speed Getaway Alert

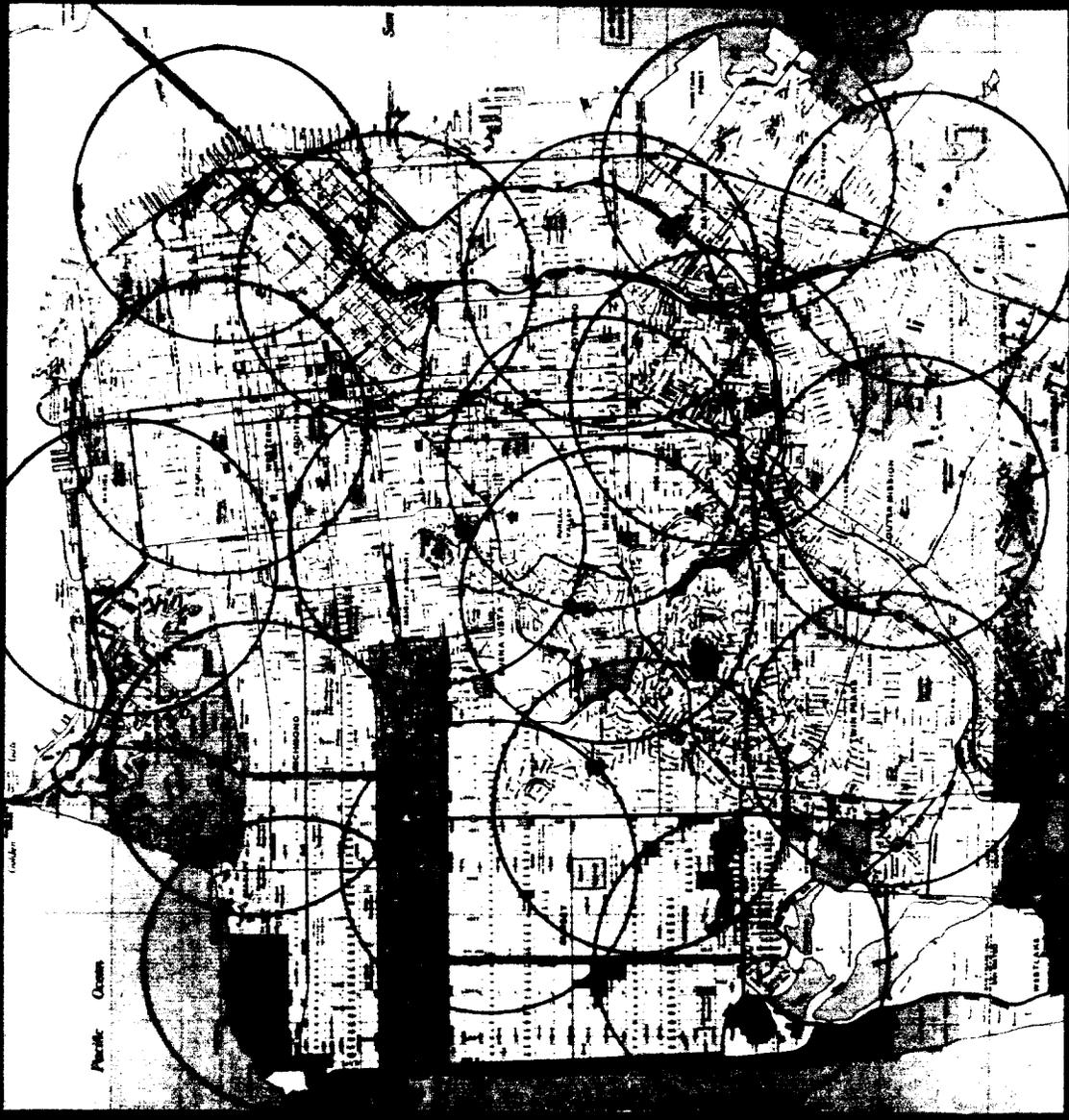


TI-Electronic Tracking System



POLICE TRACKING UNIT

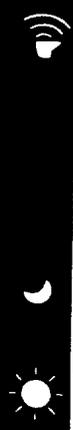
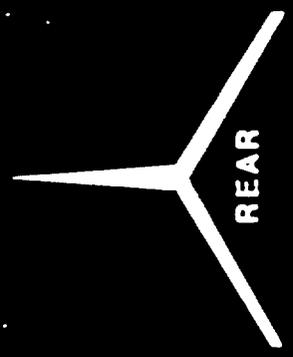
- NINE DISTRICT WITHIN SAN FRANCISCO
- THREE EQUIPPED CARS PER DISTRICT
- HAND HELD UNITS FOR ON-FOOT TRACKING TO BE AVAILABLE

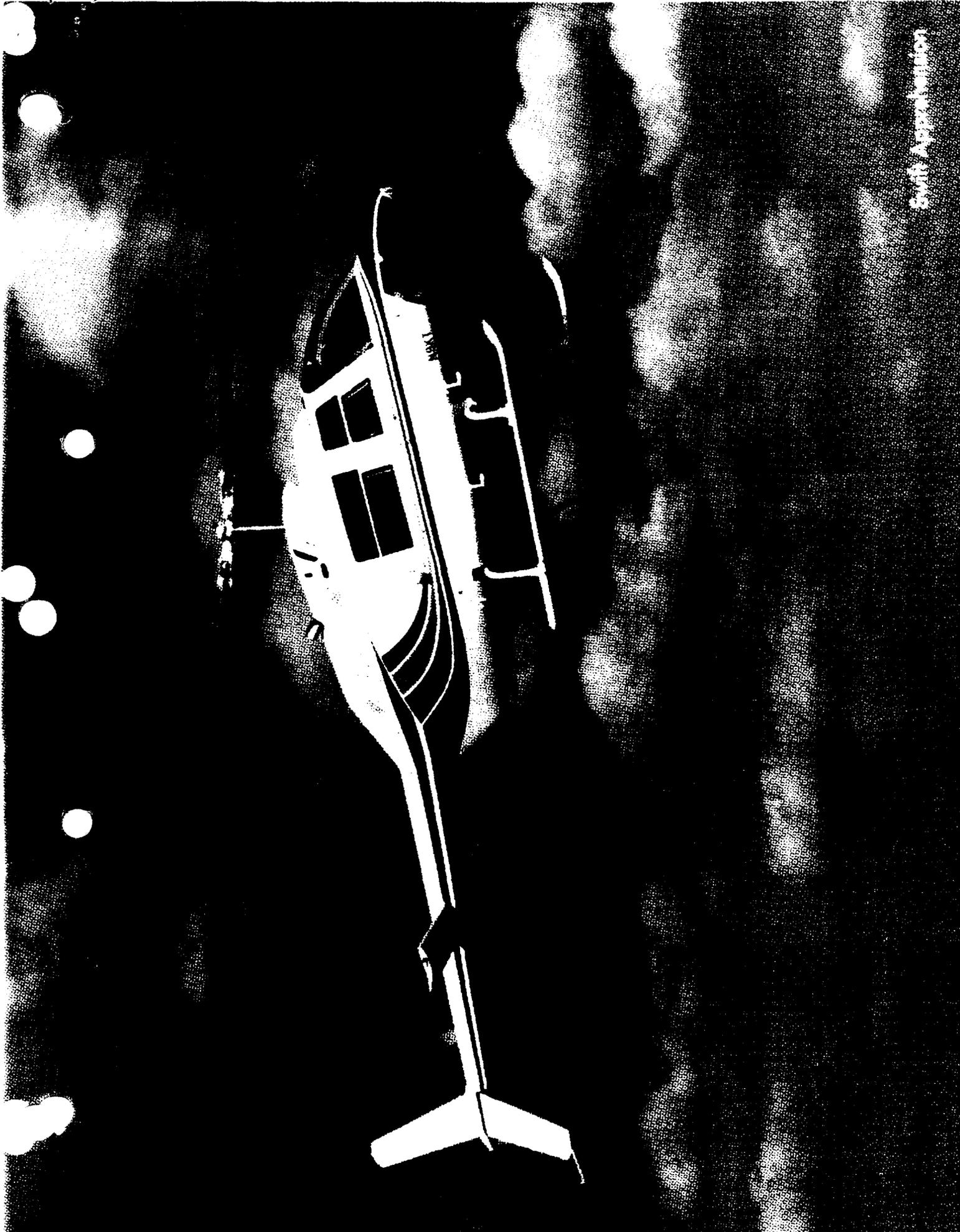






DISTANCE IN MILES

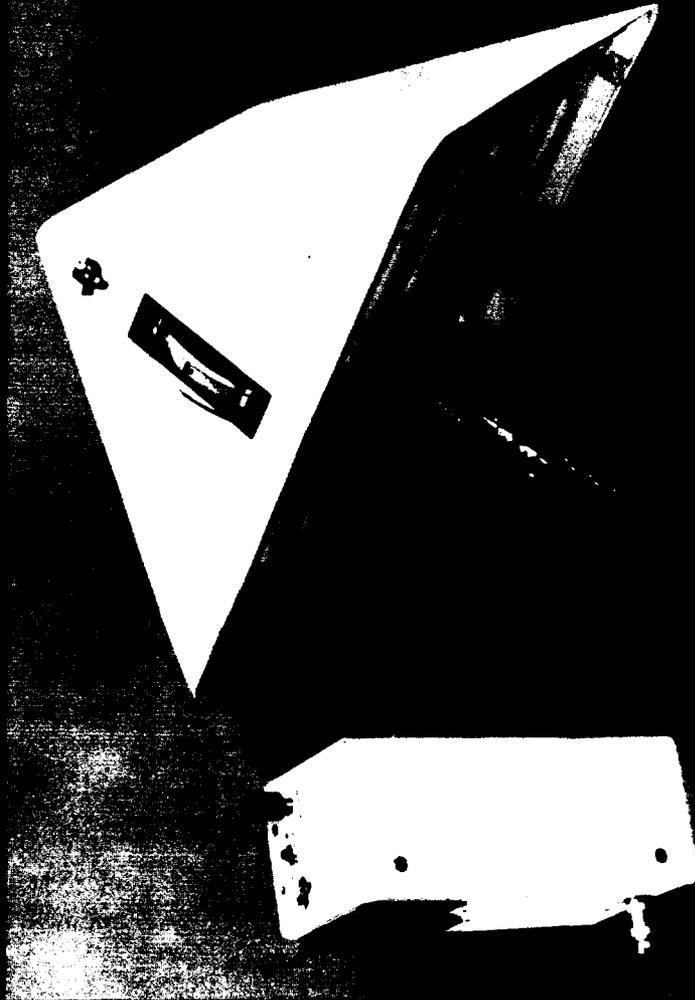
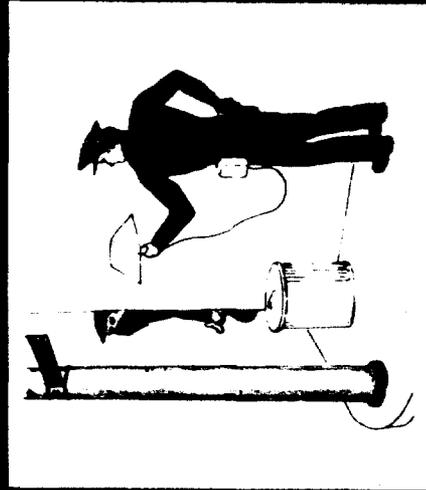
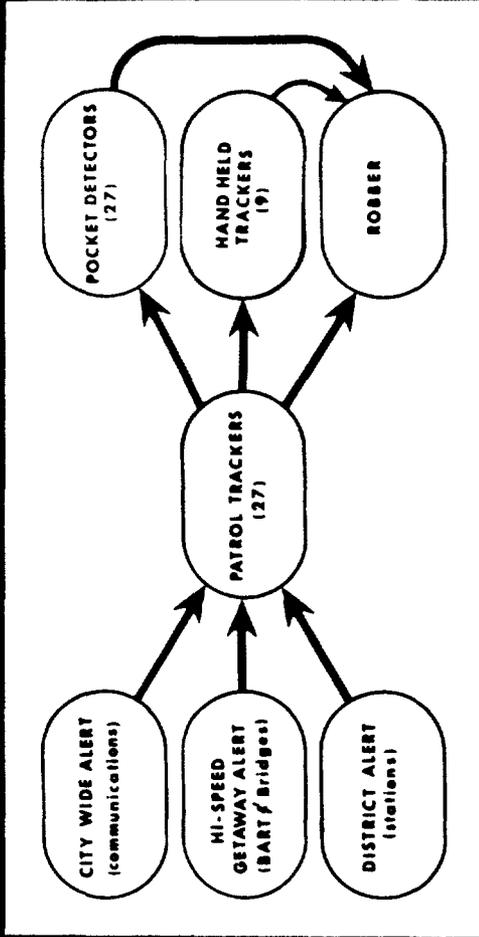




Swift Approximation

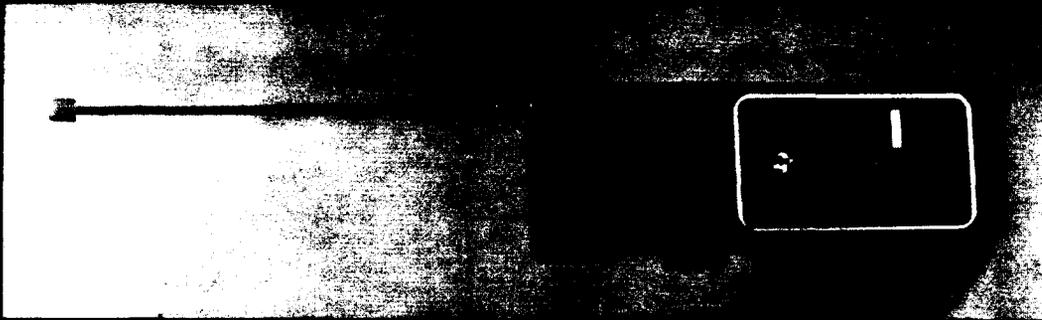
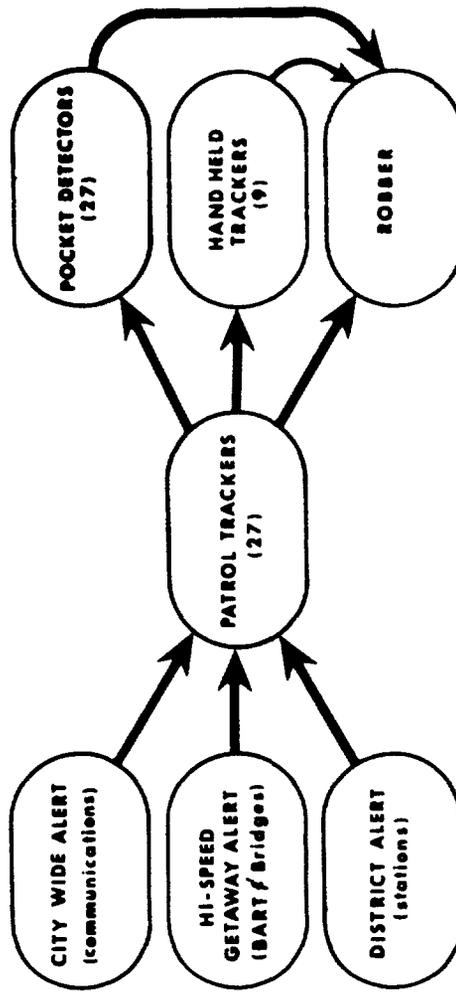
TI-ETS

Hand Held Trackers

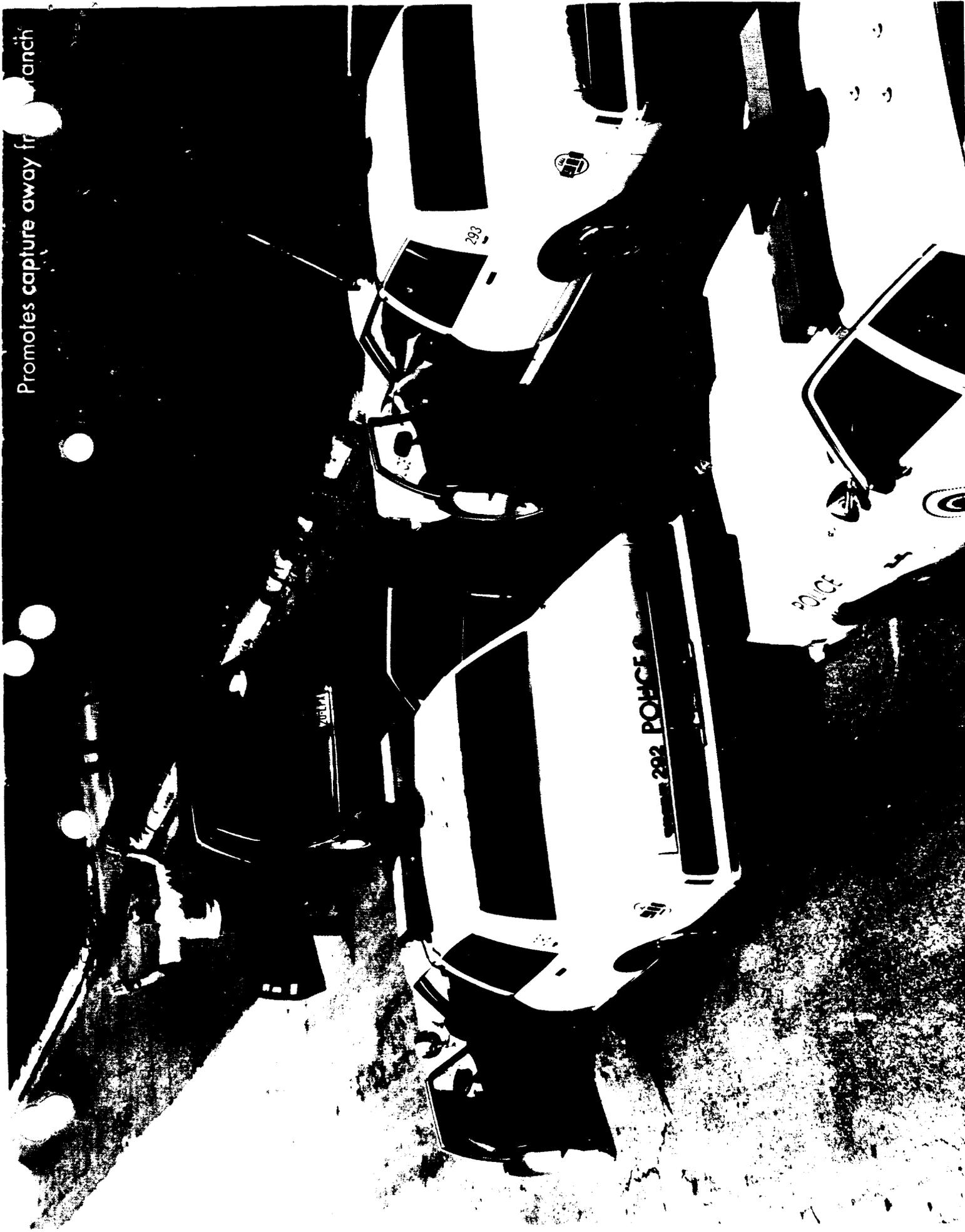


TI-ETS

Pocket Detectors



Promotes capture away from branch



Recovery of Stolen Funds

