LUBRIZOL

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July 28, 1999

Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
The Portals
445 Twelfth St., SW, Room TW-A325
Washington, DC 20554

Dear Ms. Salas:

Comments to the FCC regarding the Notice of Proposed Rule Making
WT Docket No. 99-87

The Lubrizol Corporation facility located at 29400 Lakeland Boulevard, Wickliffe, Ohio, is the primary research and development site as well as world headquarters for the Lubrizol Corporation. Employees work with a variety of chemicals used for formulating compounds related to transportation products and industrial applications. Engine testing at this facility requires the bulk storage of gasoline and diesel fuel. Two railroad corridors border our site providing a steady flow of trains transporting assorted hazardous cargoes.

A 3-channel 800mhz trunked radio system was installed on our site in August of 1994. Its original purpose was to provide a common communications system for our safety and security forces. The security group was previously using an antiquated VHF system, and our emergency response group used a newer UHF system. Communications in the field between both groups during an emergency was difficult because conversations had to be relayed through a security officer in the command center operating radios from both systems. Communications greatly improved with the implementation of the new system.

Protection of the over 80-acre facility, its employees and the community is divided into three disciplines: security, prevention, and emergency response. Our security department mans five gates during normal business hours and a command center 24 hours a day, 7 days a week along with providing a constant roving patrol of the facility. All fire alarms and 9-1-1 emergency calls are received there and security personnel are responsible for dispatching emergency responders and providing them with up to date information. Prevention focuses on process safety, fire prevention, housekeeping, employee training and record-keeping. The emergency response organization provides 24-hour immediate response to site incidents, which include medical emergencies, fires, chemical spills and releases. In the mitigation of these emergencies, additional resources are frequently called upon to assist first responders. Resources include:

- chemical operators
- environmental engineers
- facility electrical and mechanical service employees
- facility emergency management team
- local city fire department (a number of their radios have been programmed with a channel from our system)
- local hospital
- medical department (nurses and doctor)
- production facility (Painesville, Ohio)
- Security.

Facility emergency responders are knowledgeable of building layouts and chemical storage areas as well as the various processes conducted throughout the facility. Radios play an important communication role for these response teams and associated contacts. In addition, many responders are trained as emergency medical technicians. A facility ambulance is maintained to allow transportation to the local hospital during weekday shifts when over 1,000 employees, contractors and visitors are present. We also have our own foam-equipped fire truck for fighting chemical and petroleum based fires. Our local city fire department does not have this type of equipment.

The system has since grown to five channels with over 340 radios communicating within and between 37 talkgroups. Along with the safety and security groups, the other users on the system include maintenance shops, service groups, engineers, computer support, chemical operators, and environmental personnel. All safety and security radios have priority over all other radios when competing for system resources. All radios are configured with a direct channel to our security command center. Our emergency response officers also scan this channel. An emergency situation observed or experienced by anyone carrying a radio can be instantly communicated to safety and security personnel. Messages can also be broadcast to all radios on the system simultaneously from select radios. In the event that our system fails, all of our safety and security radios (and many others) have the capability to do conventional communications. While performance is degraded in that mode, this does provide us with a contingency plan for maintaining critical communications.

Aside from the benefits of greatly improved emergency communications, the increase in productivity and efficiency among the various groups using radios has increased considerably. We are averaging 3,000 calls per business day on the system. In the past, foremen and supervisors had to rely on pagers and PA systems to contact workers. This meant that a worker had to stop what they were doing, go and find a telephone, and call back to the foreman. Workers stay on the job longer, and managers are not tied to their telephones waiting for calls to come back. It is also very advantageous to have the ability to talk to all members in a talkgroup in one call instead of having to call each person individually when necessary. We have installed

telephone interconnect capability on our system which allows select users to access our PBX system and place and receive telephone calls with their radios, adding even more efficiency to their communications.

We have spent approximately $600,000 on equipment and over $100,000 on labor to configure, modify, and program the system equipment over the last five years. This investment has resulted in an extremely efficient and versatile communications system that has become an integral part of the overall operation of our facility. We do not believe that any public wireless provider can deliver the level of service and performance that our own system is providing for us today. We further believe that a regional disaster of any sort would completely tie up public networks, rendering them useless for organizations such as our own. The loss of an 800mhz trunked system such as ours would place a communications roadblock on our ability to conduct daily business. Set-to-set portable handsets do not possess the power that a repeater-based radio network affords. In effect, we would have no alternatives for effective communications if auctioning of the frequencies caused us to lose our current license.

Thank you for allowing us to bring this issue to your attention.

Very truly yours,

Kenneth M. Iwashita
Manager, Public Affairs

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Enclosure (4 copies)
cc: Gary D. Michaels