



November 26, 1999

Ms. Magalie Roman Salas, Secretary  
Federal Communications Commission  
Portals, TW-A325  
445 12th Street, S.W.  
Washington, DC 20554

RE: Ex Parte Notification-WT Docket No. 99-168

Dear Ms. Salas:

This letter is being filed on behalf of Mobilcomm, Inc., a communication sales and service organization located in Cincinnati, Ohio, representing customers from the Private Mobile Radio Service as well as customers from the Public Safety sector. Mobilcomm supports the proposed 746 MHz to 806 MHz Spectrum Band Plan presented to the FCC by Motorola Inc.

On November 23, 1999 Allen Gerth, CEO of Mobilcomm Inc., and other interested parties from the wireless communications industry met with Federal Communications representatives to discuss industry concerns. I am providing more detailed information on the mutual aid support between Private Mobile Radio Service (PMRS) users and Public Safety users, for your consideration.

Mobilcomm provides radio equipment and support services to a broad user base, including public safety agencies. A lack of PMRS spectrum is making it increasingly difficult to provide mutual aid support between public safety agencies and private security services, private ambulance services and others who perform public safety-like support services to the public.

Many large buildings and manufacturing plants in Cincinnati utilize private security guards and emergency medical personnel to supplement the lifesaving and property protection service normally provided by the surrounding jurisdictional community. The need for spectrum to communicate between public safety and private agencies providing emergency public safety-like services is critical.

These entities need radios that are industrial quality, heavy duty, with special noise suppression and the ability to withstand severe conditions. Commercial Mobile Radio Service (CMRS) radios are not designed to operate in harsh environments and do not provide coverage to many of the locations within the buildings and plants. The use of CMRS is not an option, only PMRS systems can satisfy these needs.

After a recent tornado, that devastated a portion of Cincinnati, search and rescue teams with the aid of crane and heavy equipment operators, searched for victims of the disaster.

The lack of adequate spectrum within the same radio band hampered mutual aid communications during the disaster relief effort. Public Safety agencies, Red Cross teams and private industry equipment operators, all worked diligently to help the distressed victims. Paper messages delivered by runners were often used to communicate because common radio equipment was not available.

A flood, that washed away the town of Falmouth, Kentucky, was a disaster that took this community by surprise. The flood came so fast that the whole town was under water within minutes. All telephone and CMRS services were cut off. Hamilton County dispatched their Emergency Communications Van to the area in an effort to provide communications for local public safety agencies, the Red Cross disaster team, utility companies and other agencies who supplied volunteers for the relief center. The lack of a common radio band again hampered relief efforts.

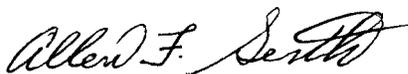
Because of the unique nature of the user base for PMRS services, the users are requesting a special spectrum allocation as a public interest determination of the FCC. In particular, the public safety community relies on many businesses in the PMRS community as an adjunct to their services. The allocation of spectrum in the 746 MHz to 806 MHz to Public Safety therefore requires an allocation of spectrum to PMRS in the same band to attain interoperability of the radio services.

To safeguard against interference, Public Safety has requested that a guard band be placed between the Public Safety spectrum allocation and the CMRS allocation. The best method to safeguard against interference is to allocate a guard band that utilizes like kind communication equipment. This would be the case, if the Motorola Band Plan were adopted with PMRS allocated in the guard band next to Public Safety. Both services would utilize the same type of radio equipment, which would offer interference protection to Public Safety.

Interference now exists in Cincinnati, between PMRS users who operate on frequencies that are next to frequencies occupied by CMRS operators. While this situation can be tolerated during a business conversation, it can be disastrous in a Public Safety life or death situation.

Mobilcomm is supportive of the Band Manager concept for the allocation of the PMRS spectrum. Nation wide PMRS blocks are most appealing since they allow for consistent coordinated allocations.

Sincerely,



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