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September 20, 2000

Ms. Magalie Roman-Salas
Secretary
Federal Communications Commission
The Portals, TW-A325
445 Twelfth Street, SW
Washington, D.C. 20554

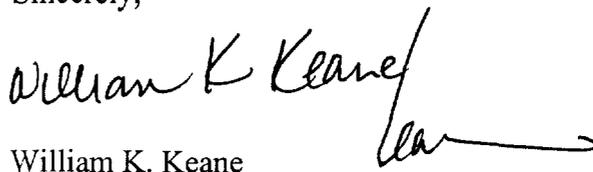
Re: Ex Parte Filing
WT Docket No. 99-87 /
RM-9267

Dear Ms. Salas:

This is to confirm that members of the Board of Directors of MRFAC, Inc. ("MRFAC") including Clyde Morrow, Marvin McKinley, and Brad Reed, among others, met with a number of Commission officials yesterday, September 19, regarding the above-referenced proceedings. The meetings were held with Commissioner Furchtgott-Roth, and his legal assistants Bryan Tramont and Kevin Murphy; with Mark Schneider, Adam Krinsky, Peter Tenhula, legal assistants to Commissioners Ness, Tristani and Powell respectively; with Thomas Sugrue and Kathleen O'Brien Ham, Chief and Deputy Chief, Wireless Telecommunications Bureau, respectively, and D'Wana Terry and Herbert Zeiler; and with Julius P. Knapp, Chief, Policy and Rules Division, Office of Engineering and Technology. Points covered during the meetings are reflected in the attachment hereto.

An original and three copies of this letter are submitted for inclusion in the above-referenced proceedings.

Sincerely,


William K. Keane

Enclosure

No. of Copies rec'd of 3
List A B C D E

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Enclosure

cc: Mark Schneider
Adam Krinsky
Kathleen O'Brien Ham
Thomas Sugrue
D'Wana Terry
Herbert Zeiler
Peter Tenhula
Julius P. Knapp

MRFAC, INC.
PUBLIC POLICY STATEMENT

THE ISSUE: Industrial Users Are In Need of a New Spectrum Allocation.

- The private land mobile community has been seeking new spectrum for five years.
- Commercial carriers offering “plain vanilla” dispatch service are consuming channels created by re-farming at a rapid rate.
- Commercial services do not meet industrial needs for specialized communications services such as: Plant automation and materials handling; OSHA-required intrinsically safe transmitters; DOD/DOE mandated encryption; “man-down” transmitters worn by workers operating solo in hazardous environments; and special sound-muffling headset radios, to name a few applications. Carriers also do not offer priority access necessary to meet most industrial reliability requirements.
- Large industrial users require their own licensed channels in order to meet operational control requirements; leased channels a lá band managers are not the answer. Nor are geographic area licenses auctioned by the Commission.

THE RECOMMENDATIONS:

A. The Commission Should Complete the Proposed Land Mobile Communications Service Allocation.

- Allocation of the proposed 10 MHz (1390-1395, 1427-1429, 1432-1435 MHz) offers a partial solution to the spectrum crunch.

B. The Commission Should Earmark At Least Two (2) MHz Of The New Allocation For Site-Specific, Internal Use Systems.

- For-profit carrier use should be restricted to specific frequencies just as it is at 800 MHz.
- A definitional line between internal use systems and private carrier systems is essential. The Commission’s decision on Multiple Address Systems (FCC 99-415, ¶ 20) offers helpful precedent (“We define private internal service as a service where licensees use the authorized frequencies purely for internal business purposes or public safety communications and not on a for-hire or for-profit basis [footnotes omitted].”)