

confronts in identifying spectrum suitable for portable/mobile communications (spectrum below 3 GHz).

Second. Even if the proponents had identified a band, it is questionable whether such a band would offer propagation characteristics suitable for low power users, especially for law enforcement tracking where range is a critical factor.

In the case of such systems, one is dealing with extremely low power devices which emit very weak signals (typically on the order of 1 mw ERP), and must be tracked through urban canyons. Worse, the transmitters are often in the trunk or on the floorboard of a getaway car, reducing the ERP to less than 1 mw. Thus, signal attenuation is of concern under the best of circumstances.

Path losses associated with higher frequencies, such as 400 MHz or above, combined with multipath effects, render it virtually impossible to conduct operations at the distances necessary for reliable tracking, e.g. one mile from a bank robber to a patrol car, five miles from a robber to roof-top receive sites.

At lower frequencies (say below 200 MHz), wavelengths require use of larger antennas on both the transmitting and receiving end, precluding their use in clandestine applications. In addition, at frequencies below 200 MHz man-made noise tends to de-sense the receivers used for tracking and triangulation. As the Commission is aware, the presence of background noise (chiefly from paging operations) in the 72-76 MHz band forced the migration of low power users to 216-220 MHz.

Accordingly, no weight should be accorded arguments that low power users like law enforcement tracking simply can be relocated. *See, e.g., Notice of Proposed Rulemaking* in PR Docket No. 89-599, 4 FCC Rcd 8657, 8660 (1989) (Commission proposes to authorize

emergency locator transmitters at 220-222 MHz due, *inter alia*, to favorable antenna design/propagation characteristics vis-à-vis 72-76 MHz); *Report and Order* in Gen. Docket No. 87-14, 3 FCC Rcd 5287, 5289 (1989) (rejecting allocation for narrowband land mobile services in low band VHF range due to, *inter alia*, antenna length and man-made radio noise problems).

Finally, the contention by Trimble that a “carrier sense” function can be used to avoid occupied channels is unavailing. *Id.* at 6. Coverage of the 35 watt RTK transmitters is far broader (a 30 mile radius according to Pacific Crest) than that of law enforcement tracking systems; the RTK equipment would likely sense the presence of a tracking signal only if the tracking transmitter were within a mile or so of the RTK transmitter site. Tracking operations further removed, i.e. within the remaining 29 mile radius of the RTK coverage area, would go undetected and, consequently, be disrupted.

The other problem with carrier sense is that it makes no allowance for the channel availability required for tracking systems. Tracking transmitters must remain in an “off” state until a crime occurs, at which time the channel must be instantly available. This is another reason the Commission, in its 1996 Report and Order, assigned two channels exclusively for law enforcement tracking. However, the RTK unit might have determined the channel to be available just moments before; the carrier sense function does not account for this.

Conclusion

For the reasons expressed here and in ETS' opening Comments, the 216-220 MHz band should be protected against new, high power entry.

• Respectfully submitted,

Electronic Tracking Systems, L.L.C.

By: William K. Keane

William K. Keane

Donell A. Hicks

Arter & Hadden LLP

1801 K Street, NW

Suite 400K

Washington, DC 20554

(202) 775-7100

Its Counsel

April 9, 2001

293625_1

DECLARATION

I, David Wood, hereby declare as follows:

I am President, Electronic Tracking Systems, L.L.C. ("ETS"). I am submitting this Declaration in connection with ETS' Reply Comments being filed in ET Docket No. 00-221. In particular, this Declaration addresses the interference that would be experienced by law enforcement tracking systems ("LETS") if high power uses were allowed in the band 216-217 MHz; and suggestions that low power incumbents like law enforcement tracking should be relocated to other spectrum.

Issue 1 – High Power Transmitters in 216 to 217 MHz

Mobex Communications, Inc. ("Mobex" or "Regionet") is among the commenters seeking high power entry. The services contemplated by Mobex (automated maritime telecommunications or possibly paging) would presumably be at effective radiated power levels of 1,000 or even 1,400 watts. See Rules 22.535, 80.215(h). Other commenters, such as Pacific Crest Corporation, have proposed 35-watt transmitters with a 30 mile range for "real-time kinematic" ("RTK") technology.

At power levels like these, low power radio service users in general, and law enforcement tracking operations in particular, would be terminally affected. High power transmitters emanating on the same channel as tracking operations would completely de-sense ETS receivers. These receivers have a very wide dynamic range (over 100db) so as to pick up a very wide range of low-level signals, and these receivers have a very high sensitivity, -142dbm worst case. This sensitivity is needed to receive and track the very low signal levels emanating from miniature transmitters (1 mw in typical conditions, often less in practice) hidden in stolen cash or goods – signals which are often seeking to radiate from the trunk of an automobile or under a seat.

Even on channels nearby, the high transmitter powers proposed would jeopardize tracking operations. The emission mask of an RTK transmitter would need to be approximately 104db below its 35 watt transmitted power to prevent disruption of law enforcement communications on nearby channels, even at a distance of one mile from the interfering transmitter. The need for this level of emission protection can be illustrated with the following example:

Assume that a law enforcement emergency occurs at the one mile distance referenced above. If the ETS transmitter is emitting from the floorboard of a getaway vehicle, the transmitted signal might be received as low as -142dbm, the minimum sensitivity of ETS-provided tracking receivers. Over a one mile distance from a 35 watt transmitter, the path loss is approximately 83db, meaning that the power level transmitted on adjacent channels by that radio can be no higher than -59dbm before interference occurs to a law enforcement receiver one mile away (83db path loss added to -142dbm sensitivity). With the 35 watt transmitter power equating to approximately +45dbm, an adjacent channel emission mask rejection of 104db would be required to limit the power in those adjacent channels to -59dbm.

The FCC was aware of this in 1996 when it provided exclusive channels for operations and specified a ceiling of 100 mw maximum transmitted power levels for all low power users including those on nearby channels. Mobex's operations at 500 watts or more, and RTK operations at 35 watts, clearly would disrupt law enforcement tracking.

Issue 2 – Relocation of the Low Power Radio Service and Law Enforcement Tracking to Another Band

Some commenters (e.g. Mobex and Securicor Wireless Holdings, Inc.) have suggested that LPRS be relocated to other spectrum. Based upon more than 20 years experience in providing the FBI and hundreds of local law enforcement agencies with tracking equipment, it is clear that the 216 to 220 MHz band is optimum for LETS service.

Below approximately 200 MHz, radio wavelengths become so long that antennas and other components can no longer be made small enough for clandestine law enforcement use. In LETS, a tracking antenna array of three antennas is mounted on the top of patrol cars and under the belly of police helicopters. A quarter wavelength of continuous ground plane is required around this array, and the three antennas, at 216 MHz, are about one foot apart. At frequencies less than 200 MHz, the required ground plane increases in size such that it is no longer feasible to operate on the limited roof size of vehicles or underbelly of helicopters.

At longer wavelengths, the miniaturized transmitter's antenna also becomes impractically large for the clandestine applications required in law enforcement. If low frequency antennas are compressed into small sizes, their efficiency degrades. This in turn degrades the radiated power below that usable for these law enforcement purposes.

Finally, at frequencies below 200 MHz radio propagation must contend with RF noise generated from a multitude of industrial sources besides licensed radios. This background noise also tends to de-sense receivers used for very low signal level LETS operations.

Problems also exist for LETS systems at frequencies above about 400 MHz. Path losses associated with higher frequencies make attempts to receive very small signals over considerable distances impossible – in the case on LETS, 5 miles from ground to building-top receiver antenna sites, and 1 mile ground to ground (bank robber to tracking police vehicle). In this regard, LETS operations depend on omni-directional antennas, negating the use of directional, high gain antennas that might otherwise be used to offset some path loss. A similar problem that increases with frequency is signal loss due to RF multipath. Triangulation for LETS tracking, by whatever method, becomes much more difficult with increased multipath effects; among other

things, the higher loss of signal strength from environmental effects (buildings, foliage, etc.) significantly decreases usable tracking ranges.

Therefore, to move law enforcement tracking systems from the 216 MHz band -- to some band completely unknown at this point -- with its need for vehicle ground planes, maximized ranges/minimized path loss, low interference levels, etc., could damage the utility of law enforcement tracking as a public safety tool.

The Use of Carrier Sensing to Avoid Interference

Certain of the RTK parties, like Trimble Navigation Limited, contend that "carrier sense" circuitry could identify unoccupied channels before transmitting, thus preventing interference. However, the typical data receiver has only approximately -120dbm sensitivity. By contrast, ETS' signal levels are often well below this, down to -142dbm. In other words, a typical RTK carrier sense circuit might only detect the LETS signal if that signal were within about one mile of the RTK 35 watt transmitter. However, Pacific Crest appears to propose one RTK transmitter to cover a 30 mile radius, an area probably larger than most metropolitan areas and certainly larger than most ETS installations. Most law enforcement tracking operations would go undetected by the carrier sense scheme and would be disrupted by RTK transmissions. Hence, the carrier sense option would prove not useful in protecting LETS and other LPRS users.

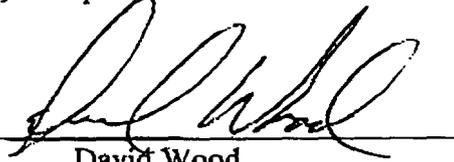
Even more sensitive carrier detection would not protect LETS operations. Pacific Crest, in its comments, advises that its transmitters could have a 70 percent duty cycle. Yet ETS systems require that the transmitters remain in a non-emitting state until a crime occurs; at that time, a LETS transmitter must immediately begin operation and the signal be immediately detectable by law enforcement personnel. This was a major reason for the Commission's dedication of two exclusive frequencies for LETS. The RTK carrier sense circuitry, which

previously might have been sensed a LETS channel as being "open" (as indeed it was), and therefore start its high power transmission, would not prevent crippling interference to LETS when the tracking transmitter is triggered.

In any event, even if carrier-sense circuitry were somehow able to protect LETS channels, it would not address the problems referenced earlier from interference on nearby and adjacent channels.

For all these reasons, the Commission should not allow additional high power operations in the 216-220 MHz band.

Executed under penalty of perjury this 6th day of April 2001.

A handwritten signature in black ink, appearing to read "David Wood", written over a horizontal line.

David Wood

ORIGINAL



AB 2073175
City of Little Rock

Police Department

700 West Markham
Little Rock, Arkansas 72201-1329

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

JUN 20 2001

Honorable Magalic Roman Salas, Secretary
Federal Communications Commission (FCC)
445 Twelfth Street S.W.
TW-A325
Washington, D.C. 20554

Re: The Matter of Reallocation of the 216-220 MHz Government Transfer Band: ET Docket
No. 00-221

Dear Secretary Salas:

This letter is in reference to the Commission's invitation for public comment on the possibility of allowing new, high-power uses of the radio spectrum band 216-220 MHz and the related notion that the radio spectrum band 216-217 MHz be auctioned.

The Little Rock Police Department is one of many police agencies that currently uses law enforcement tracking equipment in this frequency band. We have been very pleased with the results we have achieved with this technology.

In particular, use of this equipment has made a dramatic contribution to the apprehension and conviction of criminals and to a reduction in crime rates. It has proven invaluable in the rapid recovery of stolen money and property. Furthermore, criminals apprehended through use of the tracking equipment were convicted of their crimes and removed from the community. In addition, countless criminal offenses have been deterred through the use of tracking equipment.

The Little Rock Police Department urges that the Commission not allow new, high-power users in the band or an auction of the segment 216-217 MHz. We urge the Commission to preserve the band for interference-free law enforcement communications and not impede the use of law enforcement tools of police agencies.

Sincerely,

Lawrence Johnson
Chief of Police

LJ:CC:pdm

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cc: Arkansas Congressional Delegation

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THE CITY OF SAN DIEGO

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July 2, 2001

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth St. S.W.
TW-A325
Washington, D.C. 20554

Re. In the matter of Reallocation of the 216-220 MHz Government Transfer Band:
ET Docket No. 00-221

Dear Ms. Salas:

I am writing in reference to the Commission's invitation for public comment on the possibility new, high-power uses of the band 216-220 MHz will soon be permitted, and the related suggestion that the 216-217 MHz band will be auctioned.

The San Diego Police Department currently uses law enforcement tracking equipment within this frequency band. We have been very pleased with the results we have achieved with this technology.

In particular, use of this equipment has made a dramatic contribution to information gathering on criminal activity, the apprehension and conviction of criminals, and a reduction in crime rates. It has proven invaluable in the rapid recovery of stolen money and property.

The San Diego Police Department urges that the Commission not allow new, high-power users in the 216-220 MHz band, or an auction of the segment 216-217 MHz. We urge the Commission to preserve the band for interference-free law enforcement communications.

Sincerely,


David Bejarano
Chief of Police

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Office of the Chief of Police

1401 Broadway • San Diego, CA 92101-5729

Tel (619) 531-2000

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

JIMMY FOSTER
MAYOR

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PEARL, MISSISSIPPI 39288-5567

W. E. "BILL" SLADE
CHIEF OF POLICE

July 17, 2001

Ms. Magalie Roman Sales
Secretary
Federal Communications Commission
445 Twelfth St. S.W.
TW-A325
Washington, D.C. 20554

Re: In the Matter of Reallocation of the 216-220 MHz Government Transfer Band: ET Docket No. 00-221

Dear Ms. Salas;

This is in reference to the Commission's invitation for public comment on the possibility of allowing new, high-power uses of the band 216-220 MHz and the related notion that the band 216-217 MHz be auctioned.

The Pearl Police Department currently uses law enforcement tracking equipment in this frequency band. We have been very pleased with the results we have achieved with this technology.

In particular, use of this equipment has made a dramatic contribution to the apprehension and conviction of criminals and to a reduction in crime rates. It has proven invaluable in the rapid recovery of stolen money and property. Furthermore, all the criminals apprehended through use of the tracking equipment were convicted of their crimes and removed from the community. Their subsequent crimes were prevented. And the time and cost of investigation were prevented.

The Pearl Police Department urges that the Commission not allow new, high-power users in the band or an auction of the segment 216-217 MHz. We urge Commission to preserve the band for interference-free law enforcement communications.

Sincerely,

Chief Bill Slade

BS/rp

CIB-CIND

2001 JUL 20 P 2 55

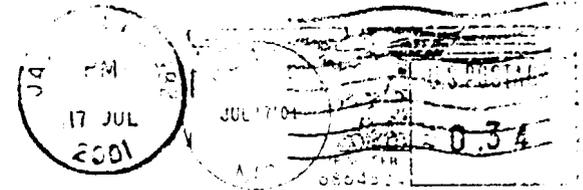
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PEARL POLICE DEPARTMENT
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PEARL, MISSISSIPPI 39288-5567



Ms. Magalie Roman Sales, Secretary
Federal Communications Commission
445 12th St. S.W.
TW-A325
Washington, D.C. 20554



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CITY OF DURHAM

POLICE DEPARTMENT
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www.ci.durham.nc.us

June 12, 2001

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth St. S.W.
TW-A325
Washington, D.C. 20554

Re: In the Matter of Reallocation of the 216-220 MHz Government
Transfer Band: ET Docket No. 00-221

Dear Ms. Salas:

This is in reference to the Commission's invitation for public comment on the possibility of allowing new, high-power uses of the band 216-220 MHz and the related notion that the band 216-217 MHz be auctioned.

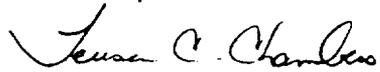
The Durham Police Department currently uses law enforcement tracking equipment in this frequency band. We have been very pleased with the results we have achieved with this technology.

In particular, use of this equipment has made a dramatic contribution to the apprehension and conviction of criminals and to a reduction in crime rates. It has proven invaluable in the rapid recovery of stolen money and property. Furthermore, all the criminals apprehended through use of the tracking equipment were convicted of their crimes and removed from the community. Their subsequent crimes were prevented. And the time and cost of investigation were prevented.

Ms. Magalie Roman Salas
June 12, 2001
Page 2

The Durham Police Department urges that the Commission not allow new, high-power users in the band or an auction of the segment 216-217 MHz. We urge the Commission to preserve the band for interference-free law enforcement communications.

Sincerely,



Teresa C. Chambers
Chief of Police

TCC:lyb

Spectrum



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City of **PHENIX CITY** *Alabama*

POLICE DEPARTMENT
1111 BROAD STREET
PHENIX CITY, ALABAMA 36867
(334) 298-0611

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June 11, 2001

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth St. S.W.
TW-A325
Washington, D.C. 20554

Re: **In the Matter of Reallocation of the 216-220 MHz Government Transfer Band:
ET Docket No. 00-221**

Dear Ms. Salas:

This is in reference to the Commission's invitation for public comment on the possibility of allowing new, high power uses of the band 216-220 MHz and the related notion that the band 216-227 MHz be auctioned.

The Phenix City Police Department currently uses law enforcement tracking equipment in this frequency band. We have been very pleased with the results we have achieved with this technology.

In particular, use of this equipment has made a dramatic contribution to the apprehension and conviction of criminals and to a reduction in the crime rates. It has proven invaluable in the rapid recovery of stolen money and property. Furthermore, all the criminals apprehended through use of the tracking equipment are convicted of their crimes and removed from the community. Their subsequent crimes were prevented. and the time and cost of investigation were prevented.

The Phenix City Police Department urges that the Commission not allow new, high-power users in the band or auction of the segment 216-217 MHz. We urge the Commission to preserve the band for interference-free law enforcement communications.

Sincerely,

Terry Morris
Terry Morris
Assistance Chief / Major

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

Re: In the Matter of Reallocation of the 216-220 MHz Government Transfer Band:
ET Docket No. 00-221

Dear Ms. Salas:

This is in reference to the Commission's invitation for public comment on the possibility of allowing new, high-power uses of the band 216-220 MHz and the related notion that the band 216-217 MHz be auctioned.

The Santa Ana Police Department currently uses law enforcement tracking equipment in this frequency band. We have been very pleased with the results we have achieved with this technology.

Use of this equipment has made a significant contribution to the apprehension and conviction of criminals and to a reduction in robbery crime rates in particular. It has proven invaluable in the rapid recovery of stolen money and property. Furthermore, most of the criminals apprehended through use of the tracking equipment were convicted of their crimes and removed from the community.

The Santa Ana Police Department urges that the Commission not allow new, high-power users in the band or an auction of the segment 216-217 MHz. We urge the Commission to preserve the band for interference-free law enforcement communications.

Sincerely,

PAUL M. WALTERS
Chief of Police

jc

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City Of Raleigh
North Carolina

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

RE: IN THE MATTER OF REALLOCATION OF THE 216-220 MHz
GOVERNMENT TRANSFER BAND: ET DOCKET NO. 00-221

Dear Ms. Salas:

This is in reference to the Commission's invitation for public comment on the possibility of allowing new, high-power uses of the band 216-220 MHz and the related notion that the band 216-217 MHz be auctioned.

The Raleigh Police Department currently uses law enforcement tracking equipment in this frequency band. We have been very pleased with the results we have achieved with this technology. Use of this equipment has made a contribution to the apprehension of criminals.

The Raleigh Police Department urges that the Commission not allow new, high-power users in the band or an auction of the segment 216-217 MHz. We urge the Commission to preserve the band for interference-free law enforcement communications.

Sincerely,

John R. Knox
Interim Chief of Police
Raleigh Police Department

JRK/pb

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POLICE DEPARTMENT

Post Office Box 9010 Addison, Texas 75001-9010

(972) 450-7100

June 8, 2001

Ms. Magalie Roman Salas, Secretary
Federal Communications Commission
445 Twelfth St. S.W.
TW-A325
Washington, D.C. 20554

Re: In the Matter of Reallocation of the 216-220 MHz Government Transfer Band:
ET Docket No. 00-221

Dear Ms. Salas:

This is in reference to the Commission's invitation for public comment on the possibility of allowing new, high-power uses of the band 216-220 MHz and the related notion that the band 216-217 MHz be auctioned.

The Addison Police Department currently uses law enforcement tracking equipment in this frequency band. We have been very pleased with the results we have achieved with this technology.

In particular, use of this equipment has made a dramatic contribution to the apprehension and conviction of criminals and to a reduction in crime rates. It has proven invaluable in the rapid recovery of stolen money and property. Furthermore, all the criminals apprehended through use of the tracking equipment were convicted of their crimes and removed from the community. Their subsequent crimes were prevented. And the time and cost of investigation were prevented.

The Addison Police Department urges that the Commission not allow new, high-power users in the band or an auction of the segment 216-217 MHz. We urge the Commission to preserve the band for interference-free law enforcement communications.

Sincerely,

Don Franklin, LCC
Chief of Police

DF/af

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WASHINGTON COUNTY SHERIFF'S OFFICE

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Ms. Magalie Roman Salas
Federal Communications Commission
445 Twelfth St. S.W.
TW-A325
Washington, D.C. 20554

**RE: In the Matter of Reallocation of the 216-220 MHz Government Transfer
Band: ET Docket No. 00-221**

Dear Ms. Salas:

This is in reference to the Commission's invitation for the public comment on the possibility of allowing new, high-power uses of the band 216-220 MHz and the related notion that the band 216-217 MHz be auctioned.

The Washington County Sheriff's Office currently uses law enforcement tracking equipment in this frequency band. We have been very pleased with the results we have achieved with this technology.

In particular, use of this equipment has made a dramatic contribution to the apprehension and conviction of criminals and to the reduction in crime rates. It has proven invaluable in the rapid recovery of stolen money and property.

The Washington County Sheriff's Office urges that the Commission not allow new, high-power users in the band or an auction of the segment 216-217 MHz. We urge the Commission to preserve the band for interference-free law enforcement communications.

Sincerely,



Jim Spinden, Sheriff

JS/kkp

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Jim Spinden, Sheriff

215 SW Adams Avenue, MS #32
Hillsboro, Oregon 97123-3874
phone: (503) 846-2700 • fax: (503) 846-2719

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MILTON, FLORIDA 32572
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FAX (850) 983-1212
E-mail: whall@srsco.net

June 7, 2001

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth St. S. W.
TW - A325
Washington, D.C. 20554

Re: In the Matter of Reallocation of the 216-220 MHz Government Transfer Band:
ET Docket No. 00-221

Dear Ms. Salas:

This in reference to the Commission's invitation for public comment on the possibility of allowing new, high-powered uses of the band 216-220 MHz and the related notion that the band 216-217 MHz be auctioned.

The Santa Rosa County Sheriff's Office currently uses law enforcement tracking equipment in this frequency band. We have been very pleased with the results we have achieved with this technology.

In particular, use of this equipment has made a dramatic contribution to the apprehension and conviction of criminals and to a reduction in the crime rates. It has proven invaluable in the rapid recovery of stolen money and property. Furthermore, all the criminals apprehended through use of the tracking equipment were convicted of their crimes and removed from the community. Their subsequent crimes were prevented. And the time and cost of investigation were prevented.

The Santa Rosa County Sheriff's Office urges that the Commission not allow new, high-powered users in the band or an auction of the segment 216-217 MHz. We urge the Commission to preserve the band for interference-free law enforcement communications.

Sincerely,


Wendell Hall
Sheriff

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CITY OF FOUNTAIN VALLEY

ORIGINAL

POLICE DEPARTMENT

(714) 593-4485 • FAX (714) 593-4453

10200 SLATER AVENUE • FOUNTAIN VALLEY, CALIFORNIA 92708-4736

Elvin G. Miali

Chief of Police

June 7, 2001

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JUN 14 2001

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Ms. Magalie Roman Salas,
Secretary
Federal Communications Commission
445 Twelfth Street SW
TW-A325
Washington, DC 20554

Subject: In the Matter of Reallocation of the 216-220 MHz Government Transfer Band: ET Docket No. 00-221

Dear Ms. Salas:

This is in reference to the Commission's invitation for public comment on the possibility of allowing new, high-power uses of the band 216-220 MHz and the related notion that the band 216-217 MHz be auctioned.

The Fountain Valley Police Department currently uses law enforcement tracking equipment in this frequency band. We have been very pleased with the results we have achieved with this technology.

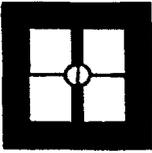
In particular, use of this equipment has made a dramatic contribution to the apprehension and conviction of criminals and a reduction in crime rates. It has proven invaluable in the rapid recovery of stolen money and property. Furthermore, all the criminals apprehended through use of the tracking equipment were convicted of crimes and removed from the community. Their subsequent crimes were prevented, and the time and cost of investigation were prevented.

The Fountain Valley Police Department urges that the Commission not allow new, high-power users in the band or an auction of the segment 216-217 MHz. We urge the commission to preserve the band for interference-free law enforcement communications.

Sincerely,

ELVIN G. MIALI
CHIEF OF POLICE

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JUN 14 2001
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June 11, 2001

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth St. S.W.
TW-A325
Washington, D.C. 20554

Re: In the Matter of Reallocation of the 216-220 MHz Government Transfer Band:
ET Docket No. 00-221

Dear Ms. Salas:

This is in reference to the Commission's invitation for public comment on the possibility of allowing new, high-power uses of the band 216-220 MHz and the related notion that the band 216-217 MHz be auctioned.

The Hillsboro Police Department currently utilizes law enforcement tracking equipment in this frequency band and have been very pleased with the results we have achieved with this technology.

In particular, use of this equipment has made a dramatic contribution to the apprehension and conviction of criminals and to a reduction in crime rates. It has proven invaluable in the rapid recovery of stolen money and property. Furthermore, all the criminals apprehended through use of the tracking equipment were convicted of their crimes and removed from the community. Their subsequent crimes were prevented as well as the time and cost of applicable investigations.

The Hillsboro Police Department urges that the Commission not allow new, high-power users in the band or an auction of the segment 216-217 MHz. We urge the Commission to preserve the band for interference-free law enforcement communications.

Sincerely,

Ronald J. Louie, Chief
Hillsboro Police Department
205 SE 2nd Avenue
Hillsboro, Oregon 97124

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City of Seattle

Paul Schell, Mayor

Seattle Police Department
Gil Kerlikowske, Chief of Police

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May 31st, 2001

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JUN 14 2001

FCC MAIL ROOM

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

Re: In the Matter of Reallocation of the 216-220 MHz Government Transfer Band:
ET Docket No. 00-221

Dear Ms. Salas:

This is in reference to the Commission's invitation for public comment on the possibility of allowing new, high-power uses of the band 216-220 MHz and the related notion that the band 216-217 MHz be auctioned.

The Seattle Police Department currently uses law enforcement tracking equipment in this frequency band. We have been very pleased with the results we have achieved with this technology.

In particular, use of this equipment has made a dramatic contribution to the apprehension and conviction of criminals and to a reduction in crime rates. It has proven invaluable in the rapid recovery of stolen money and property. Furthermore, all the criminals apprehended through the use of the tracking equipment were convicted of their crimes and removed from the community. We believe that by maintaining the current status of these frequencies that it will continue to aid our department in not only reducing crime, but also in the protection of our citizens.

The Seattle Police Department urges that the Commission not allow new, high-power users in the band or an auction of the segment 216-217 MHz. We urge the Commission to preserve the band for interference-free law enforcement communications.

Sincerely,

R. Gil Kerlikowske
Chief of Police

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June 7, 2001

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POLICE DEPARTMENT

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth St. S.W.
TW-A325
Washington, D.C. 20554

Re: In the Matter of Reallocation of the 216-220 MHz Government
Transfer Band: ET Docket No. 00-221

9065 E. VIA LINDA
SCOTTSDALE, AZ 85258

(480) 312-5000
(480) 312-5097 FAX

Dear Ms. Salas:

This is in reference to the Commission's invitation for public comment on the possibility of allowing new, high-power uses of the band 216-220 MHz and the related notion that the band 216-217 MHz be auctioned.

The Scottsdale Police Department currently uses the law enforcement tracking equipment in this frequency band. We have been very pleased with the results we have achieved with this technology.

In particular, use of this equipment has made a dramatic contribution to the apprehension and conviction of criminals and to a reduction in crime rates. It has proven invaluable in the rapid recovery of stolen money and property. Furthermore, all the criminals apprehended through use of the tracking equipment were convicted of their crimes and removed from the community. Their subsequent crimes were prevented. And the time and cost of investigation were prevented.

The Scottsdale Police Department urges that the Commission not allow new, high-power users in the band or an auction of the segment 216-217 MHz. We urge the Commission to preserve the band for interference-free law enforcement communications.

Sincerely,

Douglas L. Bartosh
Chief of Police and Director of Public Safety

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Post Office Box 90012 • Bellevue, Washington • 98009 9012

May 30, 2001

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JUN 15 2001
MAIL ROOM

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth St. S.W.
TW-A325
Washington, D.C. 20554

RE: In the Matter of Reallocation of the 216-220 MHz Government Transfer Band:
ET Docket No. 00-221

Dear Ms. Salas:

This is in reference to the Commission's invitation for public comment on the possibility of allowing new, high-power uses of the band 216-220 MHz and the related notion that the band 216-217 MHz be auctioned.

The Bellevue Police Department currently uses law enforcement tracking equipment in this frequency band. We have been very pleased with the results we have achieved with this technology.

In particular, use of this equipment has made a dramatic contribution to the apprehension and conviction of criminals and to a reduction in crime rates. It has proven invaluable in the rapid recovery of stolen money and property. Furthermore, all the criminals apprehended through use of the tracking equipment were convicted of their crimes and removed from the community. Their subsequent crimes were prevented, and the time and cost of investigation were prevented.

The Bellevue Police Department urges that the Commission not allow new, high-power users in the band or an auction of the segment 216-217 MHz. We urge the Commission to preserve the band for interference-free law enforcement communications.

Sincerely,

Tony Dempsey
Lieutenant
Patrol Section
Bellevue Police Department

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