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September 27, 2001

VIA HAND DELIVERY

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

Re: Ex Parte Filing
ET Docket No. 00-221 and PR Docket No. 92-257

Dear Ms. Salas:

This is to advise that on Wednesday, September 26, 2001, the undersigned and Mr. Dave Wood, President of Electronic Tracking Systems, L.L.C. ("ETS"), met with Julius Knapp, Lisa Gaisford, Ira Keltz, Scot Stone, and Tim Maguire.

ETS' position in this matter is reflected in its earlier filings with the Commission. In addition, certain materials were presented at the meeting, copies of which are attached.

ETS' representatives continued to note that the proximity of high power operations in the 216 - 217 MHz band would cause severe interference to law enforcement tracking. This situation would be problematic, as well, under proposals to allow such operations in half of the band, i.e. from 216.500 – 217.000 MHz.

An original and one copy of this filing are submitted for inclusion in each docket.

Sincerely,

William K. Keane

Enclosures

cc: Julius Knapp
Lisa Gaisford
Ira Keltz
Scot Stone
Tim Maguire

Reallocation of 216.500 – 217.000 MHz To High Power Operation Would Cause Severe Interference To Low Enforcement Tracking

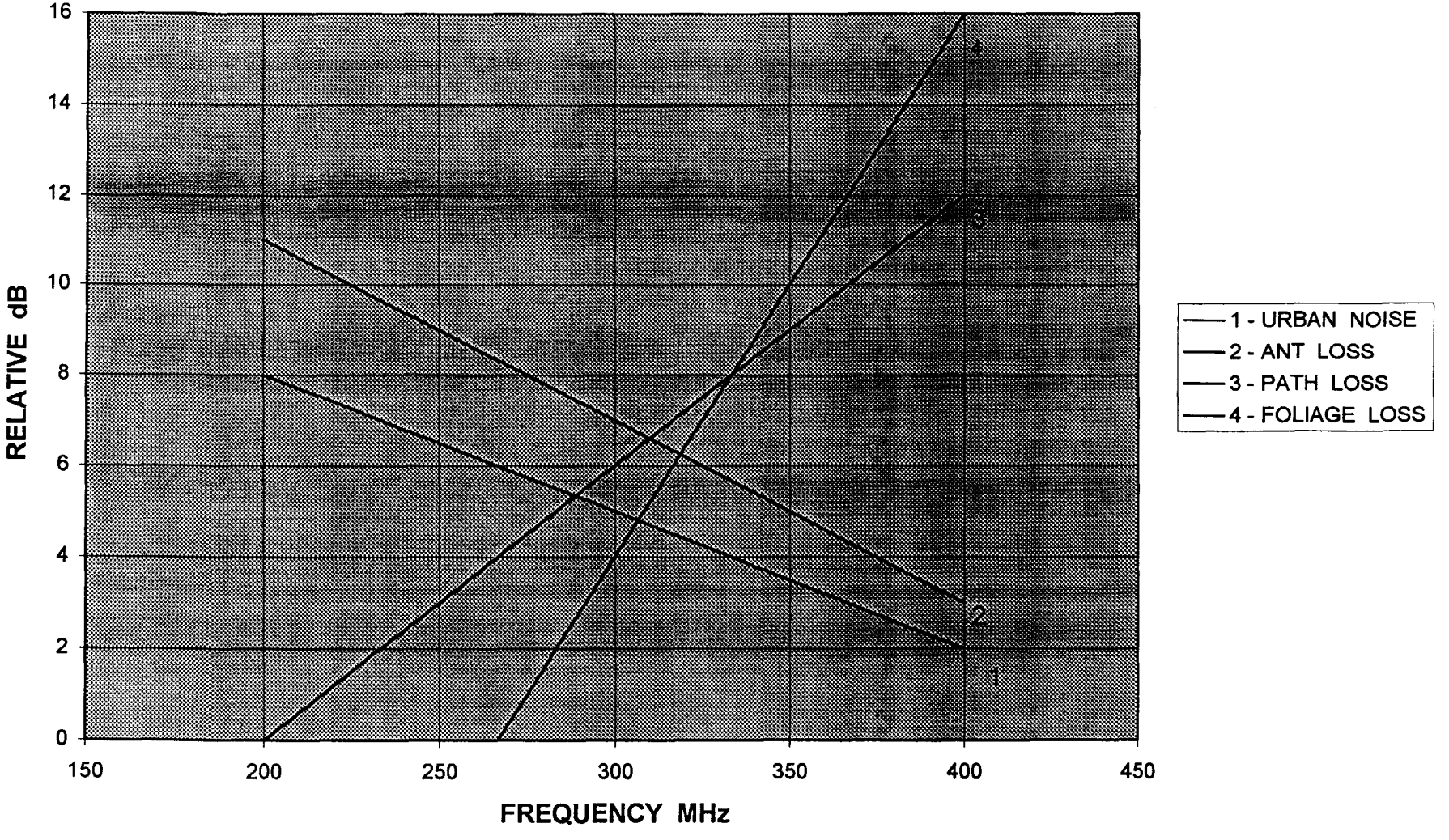
- ETS systems are extremely sensitive by design in order to maximize the tracking capability of hidden low power (10 MW max.) transmitters.

- Operation of fixed high power (e.g. 500 watt, much less 1000 or 1400 watt) transmitters at 216.500 MHz would overwhelm law enforcement tracking ("LETS") systems operating only 12.5 kHz or 37.5 kHz removed (i.e. at 216.4625 or 216.4875 MHz). For example, a 100 watt transmitter operating one mile away from the tracking system (assuming a standard 20db emission mask) would reduce the effective range of the law enforcement fixed antennas from 5 miles to 0.025 mile, rendering the tracking system useless for all practical purposes. Conversely, such a 100 watt transmitter would have to utilize emission masking of –81db for law enforcement to operate the system effectively one mile away. Operation at distances closer than one mile would again render the law enforcement tracking system useless, even with –81db masking.

- On the other hand, operation of mobile units at 216.500 MHz could produce interference by uncontrolled AMTS operation in close proximity to police officers attempting to track criminals – again overwhelming LETS' receivers. For example, even a one watt mobile transmitter would reduce law enforcement's effective ground tracking range from one mile to 0.025.

- Relocation of LETS' systems closer to 216.000 MHz would not only cause significant problems from TV Channel 13 transmissions at megawatts of power, but would cause enormous disruption and expense to law enforcement agencies all over the country.

FREQUENCY EFFECTS ON ETS SYSTEM



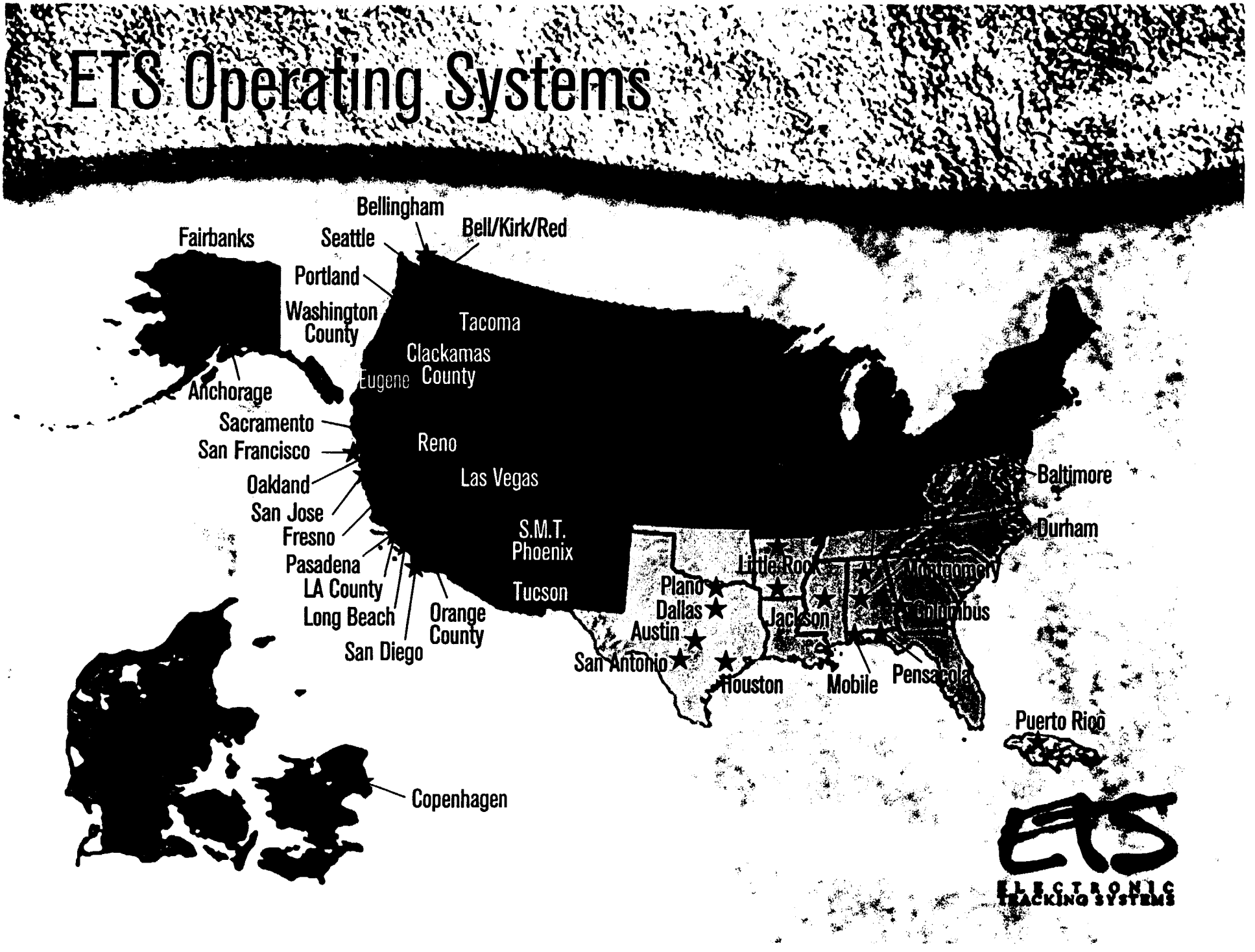
Federal Communications Commission
September 26, 2001

Electronic Tracking Systems Overview

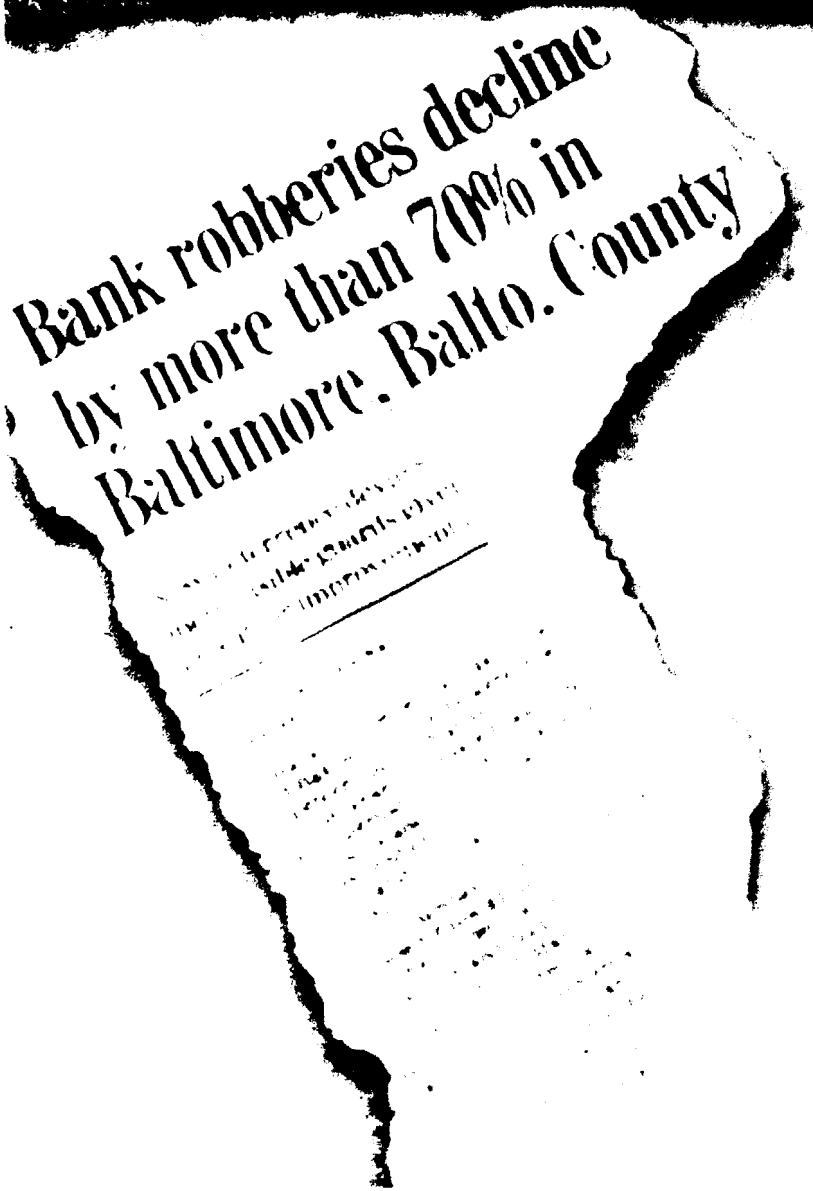
- Concept developed by Texas Instruments
- First system for San Francisco - 20 years ago
- New R&D Updates Regularly
- ProNet Acquired by Spectrum Management in November of 1999
- Currently 43 systems in 143 cities/jurisdictions
- Approximately 15% of all U.S. Bank Operations are in current coverage areas.

ELECTRONIC TRACKING SYSTEMS

ETS Operating Systems



ETS Reduces Bank Robberies


Bank robberies decline by more than 70% in Baltimore, Balto. County

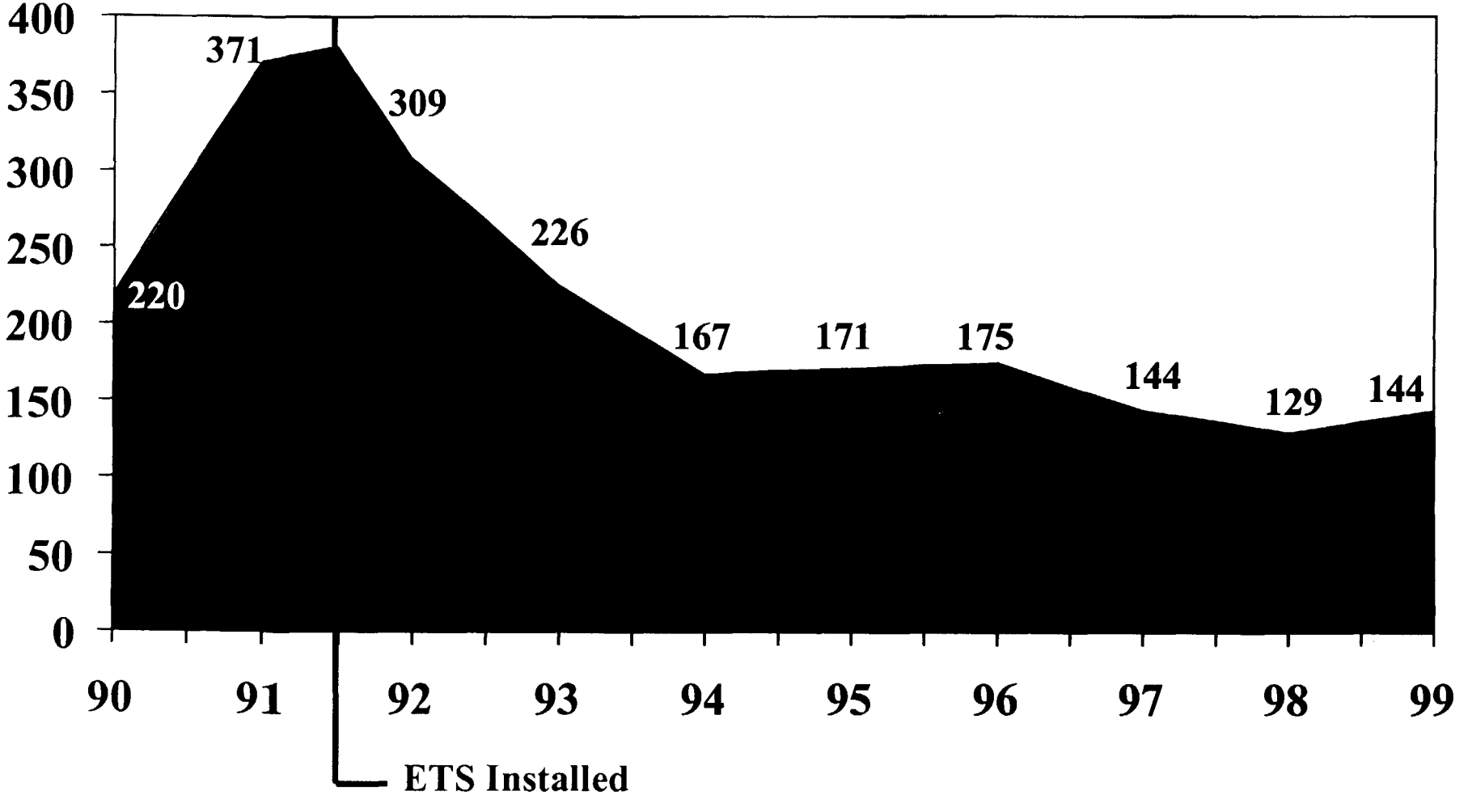
"The number of bank robberies dropped from 83 in the first four months of 1997 to 33 this year (1998) in Baltimore and Baltimore County, . . .

– The Sun
Baltimore, Maryland

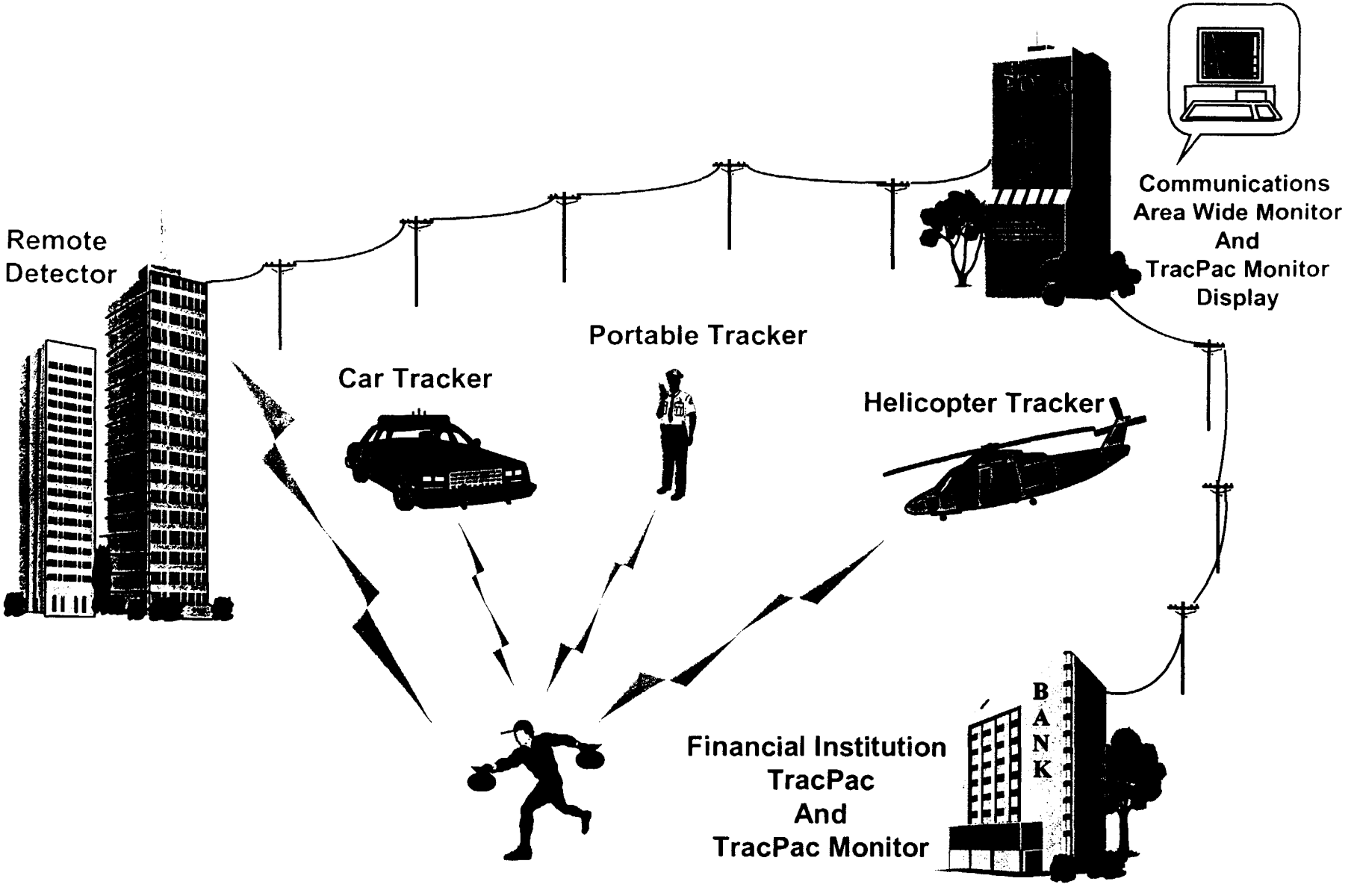
ELECTRONIC TRACKING SYSTEMS

ETS Reduces Bank Robberies

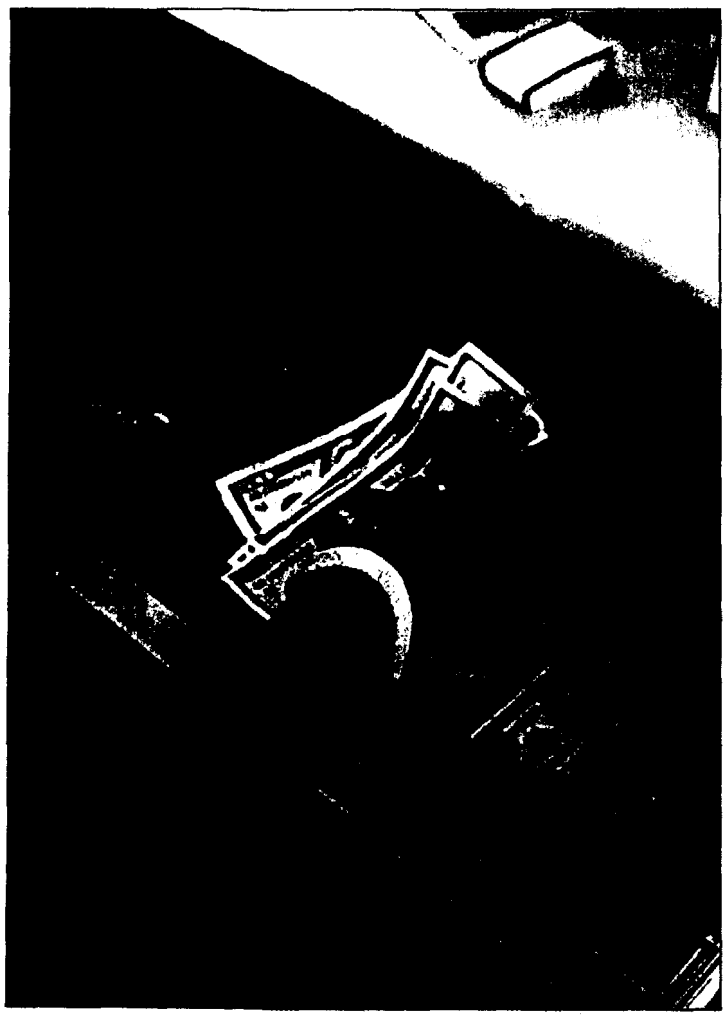
Orange County, CA



Electronic Tracking System Overview



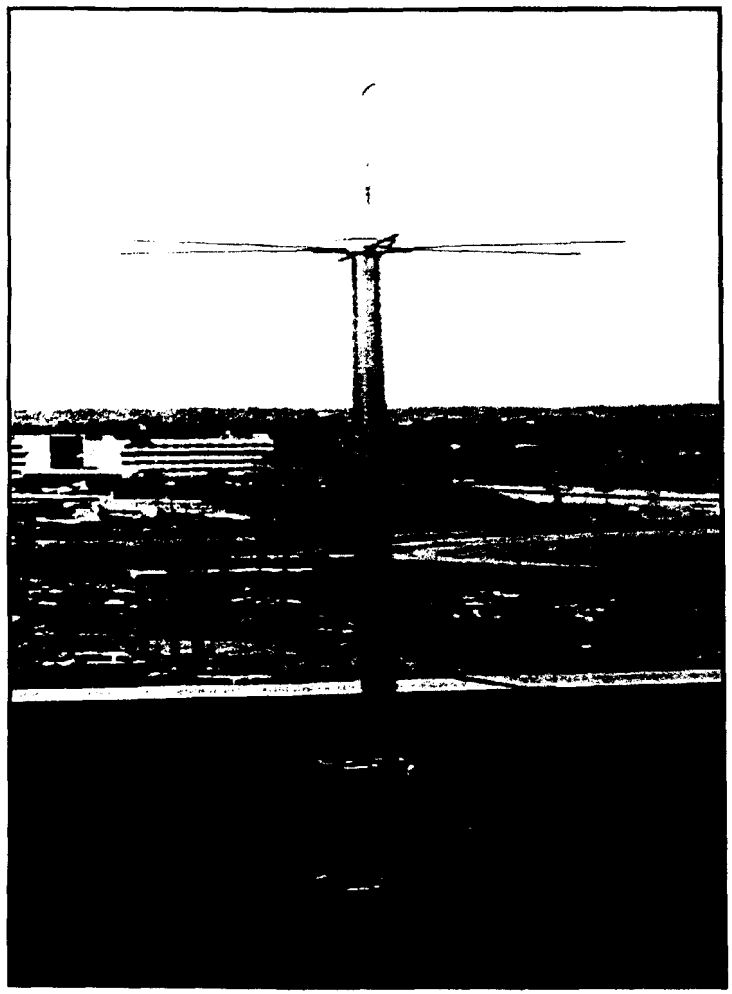
Robbery Sequence



Robbery Occurs.
TracPac is passed
to the Robber and
Automatically starts
Transmitting.

ELECTRONIC
TRACKING SYSTEMS

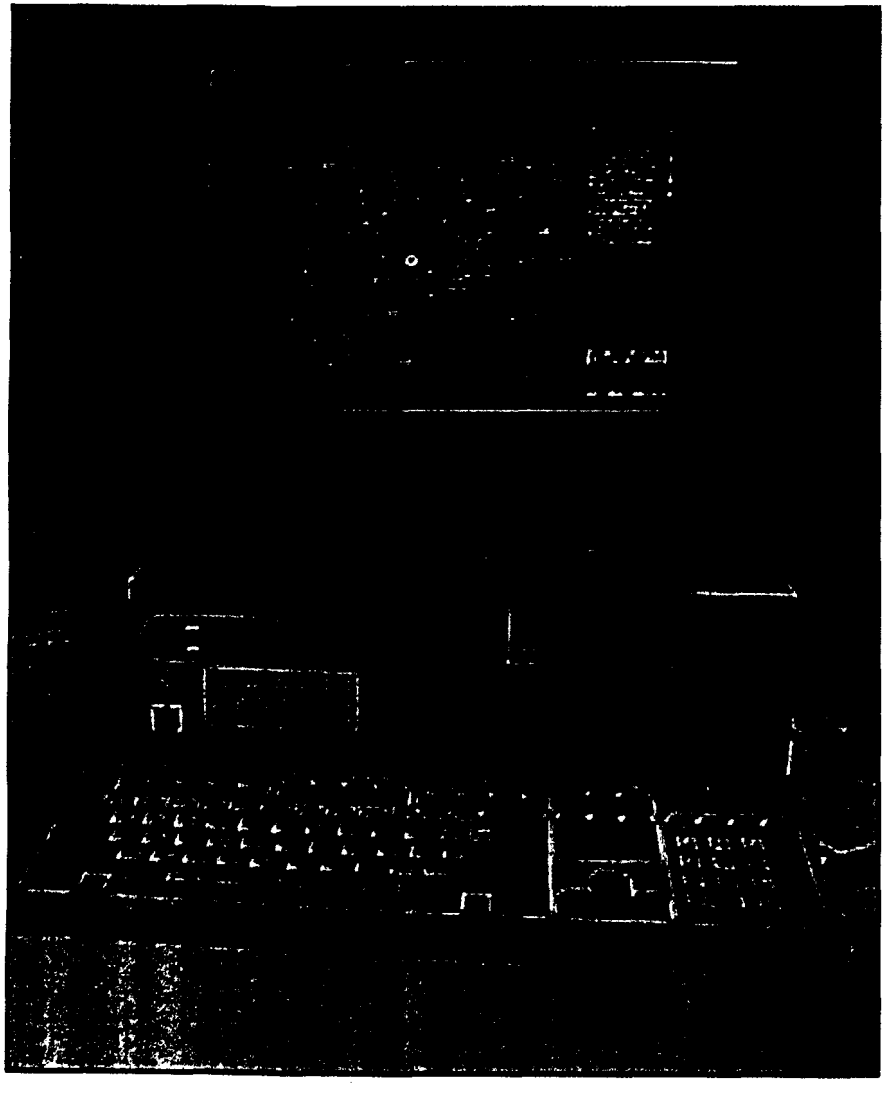
Robbery Sequence



Signal is received by
the
ETS Remote Detector
as the robber flees.

ELECTRONIC
TRACKING SYSTEMS

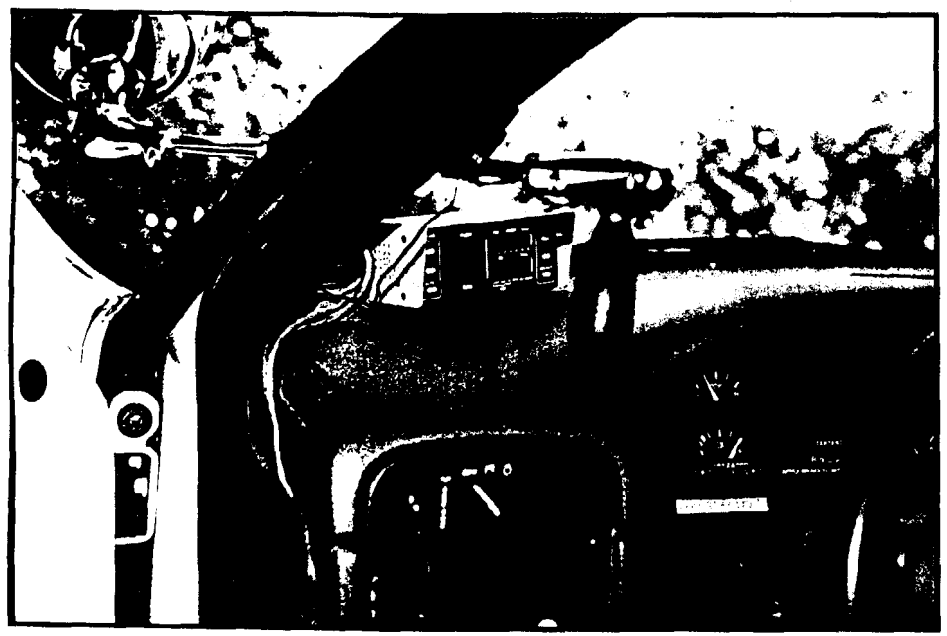
Robbery Sequence



Police Dispatch receives signal in less than one minute and tracks progress of criminal.

ELECTRONIC TRACKING SYSTEMS

Tracker Display Dash Installation



ETS
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Robbery Sequence

Criminal is apprehended and assets are recovered.

Average Capture 18 Minutes

ETS
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