

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Amendment of Part 90 of the Commission's Rules)	WT Docket No. 01-146
and Policies for Applications and Licensing of Low)	RM-9996
Power Operations in the Private Land Mobile)	
Radio 450-470 MHz Band)	

To: The Commission

REPLY COMMENTS OF THE CENTRAL STATION ALARM ASSOCIATION

The Central Station Alarm Association, and the related Alarm Industry Communications Committee (collectively "CSAA"), by its attorney, hereby submits its reply comments in the above-captioned proceeding. These reply comments specifically address certain comments filed by Hexagram, Inc. ("Hexagram").

I. The Group D Channels Should Be Protected for Safety-Related Alarm Signaling, Especially in Light of Recent Events.

In the Notice of Proposed Rule Making (NPRM), the Commission proposed to continue the existing eligibility restriction on the "Group D" channels. Under the existing rules, and as proposed in the NPRM, certain of the Group D channels are available nationwide only to persons rendering a central station protection service, approved by a Commission-recognized standards

organization.¹ Other channels are available only for approved central station operations within urbanized areas of 200,000 or more population, but may be assigned to other stations in the Industrial/Business Pool whose base, mobile relay, and control stations are located at least 120 km (75 miles) from the centers of these urbanized areas.

Hexagram, a purveyor of meter reading systems, urges the Commission to open the proposed Group D channels to wide-spread use for data transmissions. Hexagram states that the channels are currently being used for short duty cycle operations and could accommodate relocated non-voice transmissions from operations at Groups A, B and C. Hexagram further argues that such sharing would contribute to the most efficient use of spectrum by the greatest number of licensees.

As CSAA has pointed out in numerous filings before the Commission, the public is increasingly relying on private security services, such as those provided by CSAA members, for fire, burglary and medical alert protection as the services of public safety agencies become increasingly strained. The Commission recognized this as far back as the 1960s when it carved out a small allocation for the central station alarm industry when frequencies in the 450-470 MHz band were last split from 50 kHz to 25 kHz bandwidth. Since then the funding and manpower difficulties of police, fire and emergency medical operations have only increased. Central station low power operations are used for burglar, fire and medical alarm transmissions, a critical life-safety use, which would be jeopardized by other non-conflicting data. In particular,

¹ Central station commercial protection service is defined in the FCC Rules as and electrical protection and supervisory service rendered to the public from and by a central station accepted

central station alarm operations protect millions of families in their homes; and they protect a wide range of sensitive facilities from fire, burglaries, sabotage and other emergencies, including government offices, power plants, hospitals, dam and water authorities, pharmaceutical plants, chemical plants, schools/universities, and other critical facilities that could become the target of terrorist attacks as well as other life-threatening events. Protection of these public facilities from fire and intruders has always been critical. In the wake of the events of September 11, 2001, protecting them from the threat of terrorist attack has likewise become critical. The availability of radio channels for sending these safety-related alarm signals is vital, since unlike telephone lines, the radio signals cannot easily be cut or sabotaged. Indeed, many insurance companies *require* the use of alternative alarm signal modes (telephone and radio), before they will insure a facility. The nation learned the importance of adequate insurance to our economy, in the wake of the September 11 attacks.

At this time, there are only four pairs of the former 12.5 kHz offset channels that have been used by the central station industry for alarm signaling.² These four pairs of channels are already licensed and used in most metropolitan areas, and in many cases, traffic is near capacity. CSAA is one of the Commission-appointed frequency coordinators, and for several years was the

and certified by one or more of the recognized rating agencies, or the Underwriters' Laboratories (UL), or Factory Mutual System.

² Over the years, most central station alarm signaling has been done on the channels that were 12.5 kHz offset from the high power primary channels on either side. The original offset channels fell between the five pairs of high power primary channels. In the Commission's refarming proceeding, an additional low power channel (461.0125 MHz) was added for central station alarm use due to the method the Commission used to allocate the offset frequencies. However, the new channel has not proven useful to the alarm industry at this time because so many other non-alarm operations were licensed on the new channel over the years. CSAA hopes that this channels will become more useful as some of the existing low power systems discontinue operations.

exclusive coordinator for what are now being classified as the Group D frequencies. Even today, CSAA (and in particular, Robert Bitton of CSAA) handles most of the coordinations on these channels, because of the central station use restriction. CSAA has found that the increased demand for alarm operations over the past several years is exhausting available signaling channels in metropolitan areas. For instance, on the Eastern Seaboard (from Boston to the Washington, D.C. area), there are seven to eight alarm companies on each available offset channel, causing substantial traffic loading. In the wake of recent events, this growth in central station use of the Group D frequencies is expected to increase sharply. Thus, even if the Commission were to allow others on the channels, as Hexagram urges the Commission to do, they would find little relief on these channels. But more importantly, these incompatible users would create an environment in which important safety-related messages, reporting a fire, burglary, medical emergency or other attack, may not get through.

II. Use of Protected Service Areas

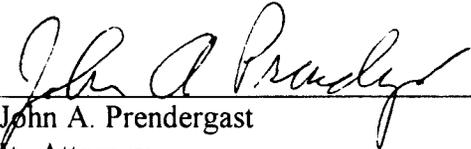
LMCC advocates the adoption of protected service areas (PSAs) for low power operations that narrowband their operations in certain low power pool frequency bands. LMCC recommends that the Commission refrain from adopting a specific PSA rule until the frequency coordinators have an opportunity to draft a consensus position on this matter. CSAA supports this approach, and may advocate a similar PSA standard for the Group D channels, once it has had an opportunity to review the consensus reached by all of the frequencies coordinators.

Summary

Accordingly, CSAA requests that the Commission not open up the Group D frequencies to further sharing.

Respectfully submitted,

Central Station Alarm Association



John A. Prendergast
Its Attorney

John A. Prendergast, Esq.
Blooston, Mordkofsky, Dickens, Duffy & Prendergast
2120 L Street, N.W., Suite 300
Washington, DC 20037

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DECLARATION

I, Robert Bitton, am President of Supreme Security Systems, Inc. in Union, New Jersey, and the former President and a current Board Member of the Central Station Alarm Association. I have handled frequency coordinations for the Association for more than ten years. I hereby declare under penalty of perjury that I have reviewed the foregoing reply comments, and verify that the factual representations therein are true and accurate to the best of my knowledge as both a frequency coordinator and alarm company operator.



Robert Bitton

SERVICE LIST

The Honorable Michael Powell
Chairman
Federal Communications Commission
445 12th Street, SW, Room 8-B201
Washington, DC 20554

The Honorable Michael J. Copps
Commissioner
Federal Communications Commission
445 12th Street, SW, Room 8-A302
Washington, DC 20554

The Honorable Kathleen Q. Abernathy
Commissioner
Federal Communications Commission
445 12th Street, SW, Room 8-B204
Washington, DC 20554

The Honorable Kevin J. Martin
Commissioner
Federal Communications Commission
445 12th Street, SW, Room 8-C302
Washington, DC 20554

Thomas Sugrue, Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW, Room 3-C252
Washington, DC 20554

Kathleen O'Brien Ham
Deputy Bureau Chief
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW, Room 3-C255
Washington, DC 20554

D'wana R. Terry, Chief
Public Safety & Private Wireless Division
Federal Communications Commission
445 12th Street, SW, Room 4-C321
Washington, DC 20554

Scot Stone
Public Safety and Private Wireless
Division
Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street, SW, Room 4-B408
Washington, DC 20554

Guy Benson
Policy & Rules Branch
Public Safety and Private Wireless
Division
Federal Communications Commission
445 12th Street, SW, Room 3-A334
Washington, DC 20554

John Schauble
Chief, Policy & Rules Branch
Public Safety and Private Wireless
Division
Federal Communications Commission
445 12th Street, SW, Room 3-A334
Washington, DC 20554

Ramona E. Melson, Esq.
Public Safety and Private Wireless
Division
Federal Communications Commission
445 12th Street, SW, Room 4-C237
Washington, DC 20554

Herbert W. Zeiler
Public Safety and Private Wireless
Division
Federal Communications Commission
445 12th Street, SW, Room 4-C343
Washington, DC 20554

Magalie R. Salas
Secretary
Federal Communications Commission
445 12th Street, SW, TW-A325
Washington, DC 20554

Larry Sears
Hexagram, Inc.
23905 Mercantile
Cleveland, OH 44122

Robert M. Gurss, Esq.
Land Mobile Communications Council
1110 North Glebe Road, Suite 500
Arlington, VA 22201-5720

Henry A. Solomon, Esq.
Garvey, Schubert & Barer
Fifth Floor
1000 Potomac Street, NW
Washington, DC 20007

Thomas J. Keller
John M.R. Kneuer
Verner, Liipfert, Bernard, et al.
901 15th Street, NW, Suite 700

Alan S. Tilles, Esq.
Jason Kerben, Esq.
Shulman, Rogers, Gandal, Pordy & Ecker
11921 Rockville Pike, 3rd Floor
Rockville, MD 20852

Terry G. Mahn
Robert J. Ungar
Fish & Richardson, PC
601 13th Street, NW
Washington, DC 20005

Jill M. Lyon
United Telecom Council
1901 Pennsylvania Ave., NW
5th Floor
Washington, DC 20006

Raul R. Rodriguez
Philip A. Bonomo
Leventhal, Senter & Lerman, PLLC
2000 K Street, NW, Ste 600
Washington, DC 20006

Louis Warchot
Dennis J. Starks
Association of American Railroads
50 F Street, NW
Washington, DC 20005

Laura L. Smith
Jeremy Denton
Industrial Telecommunications Association
1110 N Glebe Road, Ste 500
Arlington, VA 22201

Jonathan L. Weil
Philips Medical Systems
300 Minuteman Road
Andover, MA 01810

Thomas W. Curtis
American Water Works Association
1401 New York Avenue, NW
Suite 640
Washington, DC 20005

Michael J. Phelps
Dave Herrmann
Allina Health System
5601 Smetana Drive
Minnetonka, MN 55343

Lacy L. Thomas
Director, Cook County Hospital
1835 West Harrison Street
Chicago, IL 60612

Bette N. Rinehart
Motorola, Inc.
1270 Fairfield Road, Suite 5
Gettysburg, PA 17325

Wayne V. Black
Katherine C. Lucas
Keller & Heckman, LLP
1001 G Street, NW
Suite 500 West
Washington, DC 20001

John F. Lyons
Motorola, Inc.
1350 I Street, NW
Washington, DC 20005