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1050 CONNECTICUT AVENUE, N.W.
TENTH FLOOR
WASHINGTON, D.C. 20036

(202) 772-1981 FACSIMILE (202) 318-4257
johnelogan@msn.com

JOHN E. LOGAN PLLC
ATTORNEY AT LAW

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COMMENTS OF ATX TECHNOLOGIES, INC.

ATX Technologies, Inc. ("ATX") hereby submits these Comments in the matter of the Federal Communications Commission's (the "Commission" or "FCC") Spectrum Policy Task Force Seeks Public Comment on Issues Related to Commission's Spectrum

DATE: FEBRUARY 11, 2015

emergency response and other needs to customers who have telematics capability in their

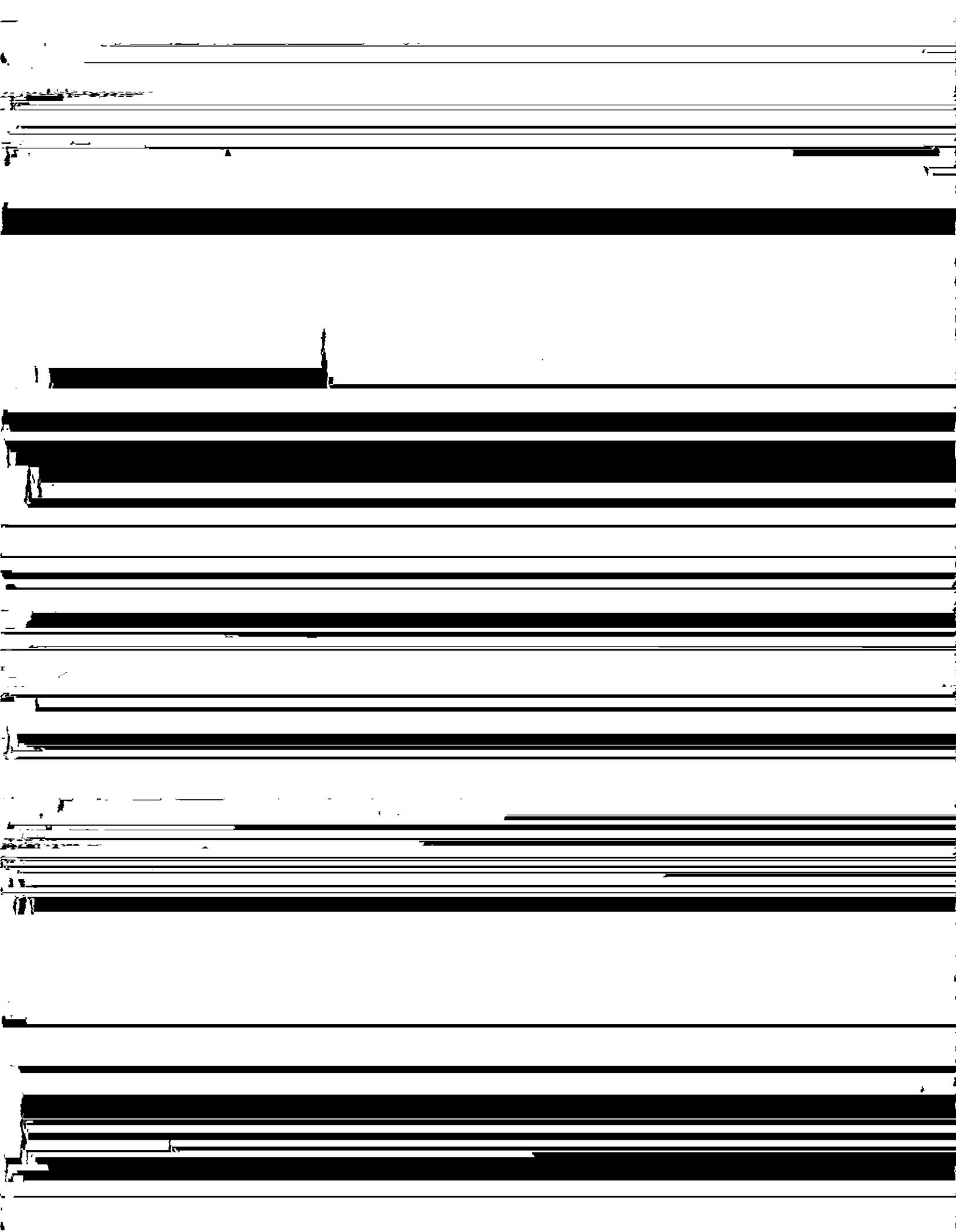
flexible use of the radio spectrum so that it may be put to its best and highest value use

[REDACTED]

paper addressing the critical elements of moving from the analog to digital environment

Provide timely rollout of location based services that are crucial in reducing emergency

[REDACTED]



Conclusion

The Commission has a difficult and complex challenge in administering the

[REDACTED]



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APR - 2 2002



In the Matter of Year 2000 Biennial Review of Part 22,
WT Docket No. 01-108

THE ROAD TO DIGITAL .

AMPS-based network – not merely “laboratory proven” or operational in the top ten (or twenty, or fifty) metropolitan markets.

How market forces will provide a clear migration path to the new digital standard

[REDACTED]

Why Telematics Is Based on the ΔMPS Standard

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standards that are fundamentally incompatible with each other and are fundamentally incompatible with the AMPS standard.

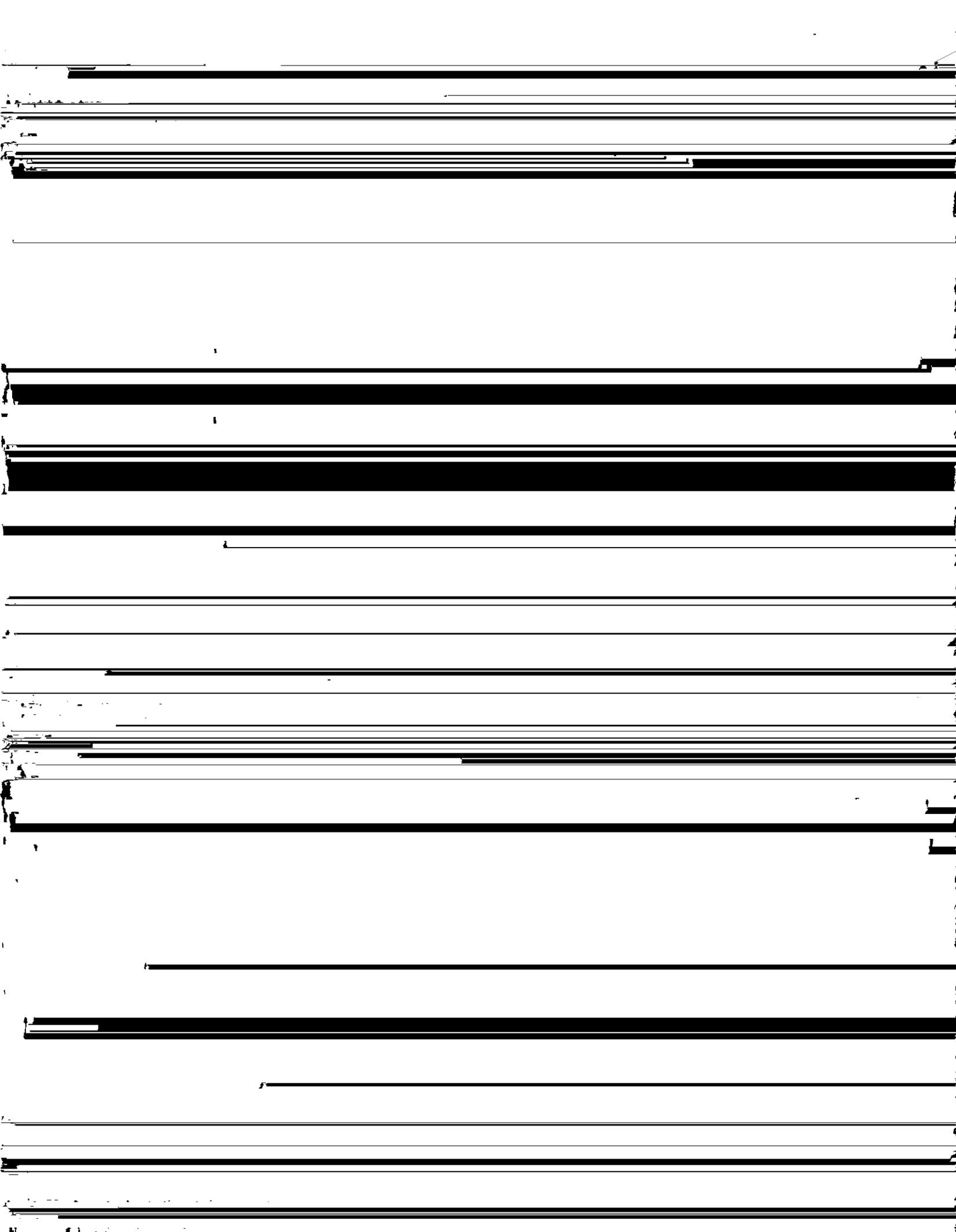
Networks based on digital technologies that utilize these incompatible standards,

~~_____~~

3. The Need for a Reasoned Transition

The goal of moving wireless communications to a digital network offers many advantages, but also entails hurdles. Chief among these is the difficulty of replicating today's enhanced public safety capabilities in the digital environment. In this regard, several carriers noted in their filings to the Commission on the AMPS compatibility issue that a "reasoned transition" is needed. ATX agrees, and simply asks the Commission to ensure that all recommended services are included in the process of

[REDACTED]



time and sending traffic alerts to vehicles along segregated routes to better manage traffic.

The issue here is not whether the market will address these issues. Private business has _____

network, is ubiquitous and integrated, and not a hodgepodge of non-interoperable systems.

- Even carriers are divided on this issue; only three entities propose immediate elimination. There is no market driven path to ensure nationwide ubiquitous coverage.

SUMMARY

Telematics provides core vehicle and public safety services to the American public. It is built on the ubiquitous analog wireless network because that network affords