

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of

**Spectrum Policy Task Force Seeks Public  
Comment on Issues Related to  
Commission's Spectrum Policy**

ET Docket No. 02-135

To: The Commission

**RELY COMMENTS**

The Central Station Alarm Association, and the related Alarm Industry Communications Committee (collectively "CSAA"), by their attorneys, hereby submit reply comments in the above-captioned proceeding. CSAA applauds the Task Force for attempting to undertake a top to bottom review of the Federal Communications Commission's Spectrum Policy and for requesting the input of the various stakeholders in the communications industry.

The Central Station Alarm Association is a trade association representing companies providing central station electrical protection services certified by the Underwriters Laboratories ("UL"),<sup>1</sup> Factory Mutual, and similar risk-rating agencies. CSAA is also recognized by the Commission as a frequency coordinator for the private land mobile frequencies available under Part 90 of the Commission's Rules.

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<sup>1</sup> Services certified by Underwriters Laboratories are permitted to use the label "UL-listed."

CSAA would ask the Task Force to recognize the danger of inadvertently throwing the baby out with the bath water by changing Commission policies that have served the public for decades. CSAA joins in with those commenters that remind the Task Force, and the Commission, that the public interest analysis eclipses the "highest and best use" principle espoused by the Task Force and must be the standard which guides this proceeding.<sup>2</sup>

CSAA agrees with the Private Radio Commenters that shared frequencies below 512 MHz should not be auctioned, nor should geographic licenses be overlaid atop those frequencies. The current licensing plan for shared frequencies below 512 MHz is efficient and workable. In urban areas the frequencies are heavily congested and would not support additional usage. In addition, the current users have significant funds invested in their current systems and should not be required to undertake a costly relocation to another band, if another band were even available for such a transition. CSAA believes that spectrum auctions should be limited to new allocations, if utilized at all.

The Task Force must also recognize the importance of retaining the existing eligibility restrictions on the private radio central station alarm frequencies. Under the existing rules, 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.<sup>3</sup> Other

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<sup>2</sup> Private Radio Commenters, *Comments*, p. 12.

<sup>3</sup> Central station commercial protection service is defined in the FCC Rules as an electrical protection and supervisory service rendered to the public from and by a central station accepted and certified by one or more of the recognized rating agencies, or the Underwriters Laboratories (UL), or Factory Mutual System.

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.

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 early 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 increased dramatically. Central station low power operations are used for burglar, fire and medical alarm transmissions, a critical life-safety use, which would be jeopardized if the Commission were to decide to license incompatible users on the frequencies.

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. Central Station operators, under the joint program of the Defense Security Service ("DSS")<sup>4</sup> and UL provide protection to DOD

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<sup>4</sup> DSS is part of the U.S. Department of Defense ("DOD").

contractors.<sup>5</sup> Alarm company employees must pass a rigorous screening program by the DSS; they must be eligible for "secret" clearance because they protect classified documents and equipment. Protection of these public facilities from fire and intruders has always been critical, but in the wake of the terrorist attacks of September 11, 2001, it is vital that these facilities are also protected from terrorist attacks as well. The availability of radio channels for sending these safety-related alarm signals is critical, since radio signals cannot be easily cut or sabotaged like telephone lines can. The availability of such channels for protection of homes and businesses is vital as well. Indeed, many insurance companies *require* the use of alternative alarm signal modes (both telephone and radio), before they will insure a facility.

At this time, there are only five primary communications channels and five pairs of the former 12.5 kHz offset channels in between that have been used by the central station industry for alarm signaling. These alarm channels are already at capacity in many of the metropolitan areas in which they are licensed. CSAA has found that the increased demand for alarm operations over the past several years is exhausting available signaling channels in metropolitan areas. Incompatible users on these channels would create an environment in which important safety-related messages may not get through. Therefore, while CSAA does not generally oppose the Task Force inquiry about removing restrictions on spectrum, the very important central-station only restriction must be maintained.

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<sup>5</sup> National Industrial Security Monitoring, UL 2050.

**Conclusion**

The Central Station Alarm Association respectfully requests that the neither the Task Force, nor the Commission, pursue the prospect of opening up the Group D frequencies to further sharing in any manner.

Respectfully Submitted,

**Central Station Alarm Association**

By       /S/\_\_\_\_\_  
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