



HEADQUARTERS

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May 12, 2003

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street SW
Washington, DC 20554

Re: RM-10687

Dear Ms. Dortch:

AAA North Jersey respectfully requests that the Federal Communications Commission deny the Informal Request for Certification filed by the Industrial Telecommunications Association, Inc. (ITA) to coordinate Automobile Emergency Radio Service (AERS) frequencies.

AAA North Jersey is a not-for-profit organization that has been providing emergency road services for 102 years. AAA North Jersey has over 440,000 members in Northern New Jersey, including several suburbs of New York City. We respond to approximately 260,000 emergency road service calls per year from motorists facing a wide variety of problems, many of which endanger the safety of drivers and their passengers.

Relying on the efficiency of its radios, AAA North Jersey quickly dispatches towing operations to the scene of motor vehicle accidents or breakdowns so that road hazards can be cleared before secondary collisions occur. AAA North Jersey also assists motorists who are stranded or involved in accidents, and transports them from road-sides and highways where they may otherwise be vulnerable to harm from high speed vehicles or crime. Without question, AAA North Jersey's prompt response to roadside emergencies saves lives and property. Congress has emphasized the need for prompt emergency roadside assistance, citing a study that shows "while deaths from motor vehicle crashes have been declining in recent years, deaths at the scene [of an accident] prior to the arrival of emergency medical care have more than doubled in the past 20 years, totaling more than

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20,000 [fatalities] per year.”¹ These findings demonstrate that the public has a compelling need for reliable automobile emergency services provided by AAA North Jersey and its other AAA affiliated auto clubs.

The use of radios to coordinate emergency road response is vital. We have always relied on the American Automobile Association (AAA) to coordinate our use of the AERS frequencies, because AAA frequency coordinators are not just “familiar” with our operations, but have *expertise* concerning the radio operations involved in emergency road service. This is because AAA is first and foremost the nation’s largest emergency road service and highway safety organization, and handles AERS frequency coordinations as an extension of this primary mission. AAA has consistently provided us with fast and reliable coordination service. Neither ITA nor any other frequency coordinator has the required expertise with the AERS channels. We cannot be assured that any other competing frequency coordinator will provide (or have the incentive to provide) this same level of protection. While ITA and other coordinators are generally driven by a profit motive, AAA is a not-for-profit entity concerned with the safety of public roadways.

In this regard, we are concerned by the “mass production” approach employed by large coordinators such as ITA, as a way to reduce costs and enhance speed of service. ITA’s Informal Request for Certification (at page 7) claims that AERS systems “are identical to the systems that ITA has and continues to coordinate for our members and clients.” This statement ignores the specialized nature of AERS systems, and indicates that our AERS coordination proposals will simply be “thrown into the hopper” and processed in the same fashion as an application for laundry truck radios. Our concern is reinforced by ITA’s argument (at page 10) that competition in the coordination of AERS frequencies is appropriate because “a majority of communications systems in the radio services ‘are used in a similar fashion – for support of day-to-day business activities.” While the AERS channels are part of the larger Industrial/Business frequency pool, AERS operations are *not* used in a similar fashion to the majority of Industrial/Business radio systems. The majority of our communications deal with the retrieval of our members from a dangerous accident or breakdown scene, and the removal of disabled vehicles that create delays and the hazard of secondary collisions for the entire public. This is why the FCC designated AAA as the exclusive coordinator for AERS frequencies in 1999. Like AAR, UTC, and API, as well as the public safety coordinators, AAA provides a public safety function, and its AERS coordinations need to look at more than just which channel has fewest mobiles licensed.

AAA recognizes the importance of AERS operations, and is intimately familiar with the unique usage patterns and priority of communications associated with these operations. What may be viewed as “acceptable loading” on a typical Industrial/Business channel is not necessarily acceptable on an AERS channel,

¹ See H.R. Report No. 105-768, pt. 1 at 10 (1998).

since AERS vehicles must stay in constant contact with the dispatcher, and in some cases with public safety officials. AAA helps to ensure that these important communications take place on an interference-free basis, by using a realistic assessment of the demands placed on a channel by AERS operators, and by avoiding the licensing of inconsistent users on the same channel.

The need for AAA's exclusive expertise in coordinating the AERS channels is even more evident because of the increased risks of terror in the wake of the September 11, 2001 attacks. AAA North Jersey's operating area is across the Hudson River from the site of the World Trade Center, and following the attacks, affected persons in Manhattan were evacuated across the river by any means possible. If another terrorist attack or other disaster took place, it would be vital that AERS systems could operate without interference, because the evacuation routes out of the New York City area must be kept clear of incidents.

In addition, AAA North Jersey's emergency road service vehicles often work with local police departments to clear vehicles away from the scene of a fire or other emergency, and the AERS frequencies are vital in coordinating such cooperative efforts with law enforcement.

In summary, we are completely satisfied with the high quality of service received from AAA, and see no need for additional coordinators in the AERS band. In fact, as discussed above, we are very concerned about the negative ramifications of allowing multiple coordinators for the AERS channels. For these reasons, we urge the Commission to deny the ITA Informal Request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David L. Hughes", with a long horizontal flourish extending to the right.

David L. Hughes
Executive Vice President

cc: FCC Commissioners
Chief, Wireless Telecommunications Bureau