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Ms Marlene H. Dortch
Secretary
Federal Communications Commission
236 Massachusetts Avenue NE
Suite 110
Washington DC 2002

Dear Ms. Dortch:

This filing is regarding paragraphs 4 through 6 of WP Docket No 07-100 / Paging on Public Safety VHF Frequencies.

Current FCC rules allow for one-way paging on VHF public safety pool frequencies. Currently, a large majority of volunteer fire departments across the nation use VHF public safety pool frequencies for both alerting and two-way communications. Most commonly, the same frequency is used for paging and two-way communications. This system allows volunteer responders to monitor radio traffic on the channel with their voice pager while enroute to the fire station or scene in their personal vehicles. Being able to monitor two-way communications on the same channel that is used for paging gives responders increased situational awareness of the incident and allows incident commanders to issue orders to all responders, even if they do not have two-way radios. These factors lead to greatly increased responder and public safety.

If responder alerting were disallowed on VHF frequencies, agencies would be forced to use other bands for this purpose, which would mean that responders would not be able to monitor two-way communications through their paging receivers. Two-way communications could be simulcast to the paging channel, but this would be extremely spectrally inefficient. In addition, the cost of adding the infrastructure necessary to support a separate paging system would be prohibitively expensive for many agencies, especially small agencies with limited budgets. One of the significant advantages of VHF alerting is that the same infrastructure can be utilized for both communications and alerting.

In its *Notice of Proposed Rulemaking*, the Commission states that high-traffic paging can cause interference to two-way communications if both types of systems share the same channel. This is undoubtedly true in certain situations.

However, there are two types of “paging” that are common on public safety pool frequencies. The first and most common type is responder alerting, which has been previously mentioned. In this type of system, paging is used to notify responders of an incident, and in most cases, to initiate two-way communications on the paging frequency. In this situation, it is unclear whether the alerting communications would be considered “Paging” under the current Part 90 definition. Currently, paging is defined as “A one-way communications service from a base station to mobile or fixed receivers that provide signaling or information transfer by such means as tone, tone-voice, tactile, optical readout, etc.”

If the alerting transmission is intended to illicit a response on the paging frequency (such as a radio acknowledgement from a fire station or officer), it could be interpreted that the alerting transmission is simply the initiating transmission of a two-way communication, and is therefore not a one-way communication and not to be considered paging. This type of “paging” is almost always low volume (with respect to voice traffic on the same frequency).

The second type of paging that is common on VHF public safety pool frequencies is true one-way paging where no response is expected on the VHF paging frequency. This type of paging is most common at hospitals, where paging traffic volume can be quite high.

Under no circumstances should the first type of paging (responder alerting) be banned on VHF public safety pool frequencies. This type of communications is widely used by full-time and volunteer fire and EMS agencies throughout the country. Forcing these agencies to switch infrastructure and procedures would be costly and could actually reduce communications capabilities of the agencies.

In addition, at the very least, limited amounts of true one-way paging should be allowed on VHF frequencies for the purpose of sending general announcements (such as notification of a vehicle being taken out of service for repair, etc.), remote device activation (such as Knox-Box® systems and storm sirens), etc.

It may be prudent to restrict one-way paging from high-volume agencies (such as hospitals), especially on mutual aid frequencies. However, some types of mutual-aid related alerting/paging should still be allowed on mutual aid channels, such as when one dispatch center “pages” another to initiate communications on the same or a different channel.

One possible solution is to allow one-way paging only for licensees that also carry two-way traffic by the same channel. However, rules to this effect would be hard to write in such a way as to prevent abuse and loopholes. In addition, this type of scheme could adversely affect some public safety agencies that have a dedicated one-way paging channel for responder alerting due to high emergency call volume in their jurisdiction.

Recommendations

- 1) The FCC should better provide a clearer definition of “paging” to clarify whether responder alerting (where the “page” initiates two-way communications on the same or a different channel) is included in the definition
- 2) The FCC should continue to allow responder alerting-related paging on VHF public safety frequencies
- 3) The FCC should continue to allow true one-way paging on VHF public safety frequencies, at least in low volume, for the purposes of remote device activation, announcements, etc.
- 4) The FCC should continue to allow alerting-related paging on mutual aid frequencies, provided that the paging is mutual-aid or interagency related (for example, one dispatch center alerting another)

Thank you for the opportunity to comment on these proposed rule changes.

Sincerely,

Andrew Knitt

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Firefighter
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