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BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D.C. 20554

In the Matter of )  
 )  
Amendment of Part 90 of the Commission Rules ) WP Docket No. 07-100  
 )

COMMENTS OF THE *City of Delafield Fire Department*

I. INTRODUCTION

The City of Delafield Fire Department, Waukesha County, Wisconsin, respectively provides these comments regarding the above captioned matters addressed in the Notice of Proposed Rulemaking, FCC 07-100, adopted by the Commission on May 9, 2007.

II. DISCUSSION

The Fire Departments in Wisconsin historically have used a VHF public safety frequencies primarily for two-way voice communications and paging operations. (Waukesha County Fire Departments use 154.430 MHz for their paging requirements). The current FCC rules allow for voice and paging operations on these frequencies. Our experience has shown that paging and voice operations can generally co-exist on the same channel in the same area with a minimum of interference.

In 2001, Waukesha County implemented an 800 MHz trunked voice radio system and all the fire departments within the county now rely on that system for voice communications. Because paging systems are not available on trunked systems, the county fire departments still rely on paging their personnel using their VHF frequencies. This "paging" not only sends a tone to open the pagers, but a voice message is included to notify the first responders of the who, what, and where information for that call for service.

We acknowledge the potential for paging to interfere with voice operations, and the potential for that to occur can increase as the amount of paging traffic increases. We also acknowledge, that if the licensee complies with the current licensing requirement to monitor the channel before transmitting occurs, that his potential for interference is manageable, and in fact has been managed successfully for many years.

We realize that the Commission may have in fact received informal complaints about VHF paging systems interfering with public safety two-way voice communications. We also are concerned about paging interference to our public safety communications channels, but we feel if the FCC enforces current licensing restrictions, there is a method in place to address this issue.

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Paging on mutual aid frequencies in Wisconsin is becoming more and more important since the states Fire Departments have recently embraced the concept of MABAS. This is a state-wide fire mutual aid system that uses a common frequency (154.265 MHz) for paging and voice communications for notification of alarm activation and units due to respond. This system called the Mutual Aid Box Alarm System is recognized as a model for fire service mutual aid and is being used by other states to facilitate the sharing of resources for fire and rescue emergencies. The elimination or restriction of paging on the mutual aid frequencies would severely impact our ability to effectively use this resource.

### III. CONCLUSION

We, as the primary users of these systems appreciate the FCC's willingness to solicit comments on this issue and believe that if any restrictions on paging operations on VHF public safety frequencies are enacted, especially on those frequencies reserved under the rules for mutual aid/interoperability communications, this would have a negative impact in our ability to use "paging" to notify our first responders in a timely and efficient manner.

We firmly believe the FCC has the authority and ability to enforce the current rules in Part 90 as it relates to interference issues. And it is incumbent upon the existing users of these systems to work together to help eliminate interference issues.

We also believe the FCC has an opportunity to address some of the interference issues as they go forward with the Narrow-banding process and better allocate those frequencies so as to reduce the potential for interference as the new license applications go through the frequency coordination process. To do anything now would not only create an operational nightmare, it would also place an economic impact on departments that must rely on paging operations.

Finally, we ask that you do not rule in favor of eliminating paging operations in the VHF public safety frequencies altogether.

Respectfully Submitted,

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