

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

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In the Matter of )  
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Amendment of Part 90 of the Commission Rules) WP Docket No. 07-100  
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**COMMENTS OF THE ILLINOIS MUTUAL AID BOX ALARM SYSTEM  
DIVISION 11**

**I. INTRODUCTION**

The Illinois Mutual Aid Box Alarm System (MABAS) Division 11 provides these comments regarding the above captioned matters addressed in the Notice of Proposed Rulemaking, FCC 07-85, adopted by the Commission on May 9, 2007.

**II. DISCUSSION**

The Illinois Mutual Aid Box Alarm System is a fire department mutual aid system in the State of Illinois covering nearly the entire state and comprising 63 separate Divisions. Division 11 is located in the north east portion of the state bordering the western edge of the City of Chicago. Division 11 is made up of seven fire departments serving the communities of Berwyn, Cicero, Forest Park, North Riverside, Oak Park, River Forest and Stickney. Division 11 would like to offer the following comments regarding this NPRM.

**Paragraph 4.** The fire service in Illinois has a long history of using paging on the voice channels. This is certainly the case for the fire departments that comprise Division 11. These departments use paging on their primary voice channels, which are shared by multiple departments for their day to day primary operations. This is done for alerting primary responding units, alerting auto and mutual aid units, alerting on duty personnel to return from various duty related non-emergent assignments, alerting off duty personnel to respond, alerting call back personnel for station coverage and making announcements of interest to other surrounding departments or for their personnel. Eliminating or restricting the use of paging on the voice channels would be detrimental to these departments. The FCC acknowledges that “paging and voice operations can generally co-exist on the same

channel in the same area, provided the paging transmissions are infrequent (low traffic volume) and the paging licensee monitors the channel prior to transmitting.” Loss of this paging capability would be a financial burden for them to bear to implement another method for their alerting needs.

**Paragraph 5.** The fire service in Illinois has a long history of using paging on the voice channels. MABAS has designated two primary VHF voice channels (154.265 MHz and 154.3025 MHz) for statewide interoperable communications for mutual aid purposes. The primary means of alerting fire departments state wide of a mutual aid emergency is using paging tones on these frequencies. Every increase in alarm and even the striking out of the box or extra alarm incidents is preceded by the activation of the statewide tones on the voice channel. Eliminating or restricting the use of paging on the voice channels would be detrimental to the fire service in Illinois. The FCC acknowledges that “paging and voice operations can generally co-exist on the same channel in the same area, provided the paging transmissions are infrequent (low traffic volume) and the paging licensee monitors the channel prior to transmitting.” The loss of the paging capability would be devastating to a mutual aid system that has continued to grow since its inception in 1969, to where it is expanding into surrounding states (Wisconsin, Indiana and Iowa). There is no simple solution to replace this tried and true method of alerting the hundreds of fire departments across this state in the event of an emergency that out strips any one department’s capacity to handle. It would be a serious financial burden on the departments of Division 11 to implement some other resource to replace the paging system that we now use so effectively.

**Paragraph 6.** The fire service in Illinois has a long history of using paging on the voice channels. This is done for alerting primary responding units, alerting auto and mutual aid units, alerting on duty personnel to return from various duty related non-emergent assignments, alerting off duty personnel to respond, alerting call back personnel for station coverage and making announcements of interest to surrounding departments or personnel. Eliminating or restricting the use of paging on the voice channels would be detrimental to the fire service in Illinois. In a majority of cases the paging is used by a large portion of the volunteer departments that would find it financially impossible to implement other more costly commercial based systems that are less effective for alerting their members. The increased cost of commercial systems would also impact the smaller full time departments that use RF paging.

Paging on mutual aid frequencies in Illinois is critically important and should be maintained as an option on the voice channels. The Illinois Fire Service has a state-wide fire mutual aid system that uses a common frequency (154.265 MHz and 154.3025 MHz) which uses radio frequency paging for notification of alarm activation and units due to respond. MABAS is recognized as a model for fire service mutual aid and is being copied by other states to facilitate the sharing of resources for fire and rescue emergencies. Division 11 feels that the implementation of any restrictions would be detrimental to the existing

departments and stifle the growth of the very valuable mutual aid system and the interoperable radio system that has been put in place. The elimination or restriction of paging on the mutual aid frequencies would severely impact this operation across the state of Illinois and other surrounding states. Any restrictions would be a serious impact on the current MABAS operations. It would also cause a financial hardship to find an implement another method of alerting hundreds of departments across the State of Illinois and other neighboring states that are implementing the MABAS program.

#### IV. CONCLUSION

The fire departments of MABAS Division 11 are opposed to any restrictions that might be imposed on the local or mutual aid VHF frequencies as described above.

Respectfully Submitted,

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