

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Use of Signal Boosters and Other Signal)	WT Docket No. 10-4
Amplification Techniques Used With)	
Wireless Services)	

REPLY COMMENTS

Pyramid Communications, Inc. (“Pyramid”), through counsel and pursuant to the Commission’s Public Notice of January 6, 2010,¹ hereby respectfully submits its Reply Comments in the above-referenced proceeding.

Pyramid is pleased that the proposal submitted by Pyramid to amend Sections 90.265 and 90.20(d)(34) of the Commission’s Rules has met with significant industry support. Supportive comments were filed by public safety agencies such as the Wisconsin State Patrol, the California State Firefighters’ Association, Clatsop County, Oregon, the City of Amarillo Fire Department, the Glendale, Arizona Fire Department, and the Panhandle Regional Planning Commission. A number of companies that install VRS units for public safety agencies were also supportive, such as Epic Marketing, Inc., Co-Meg Sales, Advanced/PLM Sales & Marketing, McLaughlin-Long Marketing, Inc., Electronic Communications, A&B Communications, the Cambridge Group, 2-Way Communications Service, Inc., and Secom Systems, Inc. These comments clearly demonstrate the need for a specific allocation for Vehicular Repeater units (VRS).

Comments opposing Pyramid’s request were filed by the Forestry Conservation Communications Association, Inc. (“FCCA”). Primarily, FCCA’s concern is the need for

¹ DA 10-14, released January 6, 2010.

firefighters to fight forest fires in the same location as users contemplated by Pyramid in its request.

Pyramid appreciates FCCA's concern. However, the firefighters which are of concern to FCCA are actually the same firefighters which Pyramid is seeking to support. Specifically, the current rule would restrict VRS unit use by firefighters to fighting forest fires. Yet, the VRS unit could not be used for an office building fire at the same location (if it were not associated with the forest fire). In any event, it is unlikely that a forest fire would be in the same location as a building, shopping mall or arena. The limited ERP of VRS units provide additional mitigation from potential reuse by another user nearby. To reduce this possibility further, Pyramid has proposed that a number of frequencies be made available for VRS units, giving firefighters and police officers a variety of options to ensure that such efforts will have the maximum effectiveness. However, if there remains a concern about potential interference, Pyramid would not oppose a limitation on these specific Forestry Conversation frequencies to restrict VRS use to firefighters. With the multiple frequency options proposed by Pyramid, police users could be directed to non-Forestry Conservation frequencies for VRS use.

FCCA criticizes Pyramid for "electing" to design equipment that needs "such a wide frequency separation." Curiously, FCCA only cites to amateur radio service repeaters as an example of the ability to use a narrower channel separation. Amateur radio service operation is meant for base station, where the option exists for proper antenna separation (on the order of 50-60 vertical feet). Mobile operations do not have this luxury.

Obviously, VRS must be public safety grade and portable. FCCA cites no existing public safety vehicular repeater manufacturer (and Pyramid is not aware of any) that markets a VRS unit that can operate with less than a 2 MHz frequency spread. Increasing the size of the unit in

order to have a larger filter eliminates the usefulness of the units, which must be fitted into crowded police vehicle and fire apparatus.

To be specific, filters capable of 600 kHz spacing at VHF use eight inch cavities. A typical arrangement from Telewave (Model TPRD1484) is 34" x 19" x 11" and weighs 25 lbs. Clearly, such a unit would not fit into a police vehicle or fire apparatus, and certainly not motorcycles, where VRS units can now be used.

WHEREFORE, the premises considered, it is respectfully requested that the Commission act in accordance with the views expressed herein and initiate a proceeding to amend the Commission's Rules to provide specific frequency allocations for Vehicular Repeater Units.

Respectfully submitted,

PYRAMID COMMUNICATIONS, INC.

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It's Attorney

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