

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

In the Matter of)
)
Amendment of Sections 90.20(d)(34) and 90.265) PS Docket No. 13-229
Of the Commission's Rules to Facilitate the use of)
Vehicular Repeater Units)

COMMENTS

[Advanced PLM], located in the state of [IL], pursuant to the Commission's Public Notice of September 16, 2013 ¹, hereby respectfully submits its comment in the above-referenced proceeding.

I. BACKGROUND

Provide a company bio. Tell the commission how long you have been in the industry, who your customers are, etc. You may also want to describe some of your customers and how they value vehicle repeaters.

You may want to add details about how many vehicle repeaters you have sold in your territory and how they benefit the safety of the community and are essential to securing the safety of life and property.

¹ See Order and Notice of Proposed Rulemaking, Amendment of Sections 90.20(d)(34) and 90.265) Of the Commission's Rules to Facilitate the use of Vehicular Repeater Units , PS Docket No. 13-229

II. COMMENTS

Detail your support for the expansion of VHF spectrum for vehicle repeater use. Mention that SVR units are licensed pursuant to Section 90.20(d)(34) and 90.265 of the Commission's Rules and how you feel that expanding the VHF spectrum for vehicle repeaters is required for VHF vehicle repeater operations.

Explain how vehicle repeaters, when used VHF in-band, require a 2-5 MHz minimum frequency separation from mobile radio frequencies. Your comments should include explicit comments to support the expansion of available frequencies.

If you would like to add technical objection to the comments filed by UTC and other telemetry users, please do. They claim that user of other filter technology is available that could allow tighter band split allowances between the mobile TX and the Vehicular Repeater channel in a vehicle. Unfortunately, what is not being understood is that we are not trying to avoid interference from a far off station or adjacent channel user some distance away, but rather trying to reduce the near field RF interference from a 100W transmitter that is located in the same vehicle and as the Vehicular Repeater is by definition of its operation, is transmitting at the same time the Vehicular Repeater is receiving. Thus, High Q Cavity filters are the best solution to reduce the mobile radio's high levels of transmitter phase noise and protect the local receiver of the Vehicular Repeater. Regarding better technology of cavity filters, there are filters available that can provide enough isolation between high power transmitters and receivers to supply less than 1 MHz (or 600 KHz) of separation. This is the type of equipment that you would find at a tower site, not in the trunk of a vehicle. Due to size and cost, it isn't feasible to

suggest such equipment. I urge you to voice your concerns of price burdens and the tight spaces available in today's police and fire vehicles when you combine radio equipment with other modern technology that is in every vehicle.

You may have noticed that the frequencies in the New Rule Making are less than what we originally asked for. We have been reduced to one option of available spectrum, which isn't really a bad thing. It does seem to fit the general needs of Vehicular Repeater use by the fact it provides ample frequency separation as well a logical way to coordinate these frequencies based on availability in your area. 173 MHz Public Safety/Business/Industrial Frequencies – Section 90.20(d)(34) - consist of Six channels that are currently channels that are used for Telemetry (not voice). Form your own opinion here, but it stands to reason that there will be at least a few of these Six channels available for Public Safety use in most regions. With proper coordination, it seems reasonable that they can be safely licensed. It also stands to reason that many telemetry devices have the ability to monitor a channel or retry their short data bursts in order to relay information. If a collision occurred, modern telemetry technology should overcome interference issues as a last resort.

Regarding coordination, put your option in if you would be willing to pay your coordinator for more time when licensing one of these channels in order to research any possible contention with incumbent users.

Now is your time speak-up on behalf of your customers or your own agency. We all know how hard it has been licensing VHF spectrum for vehicle repeaters, so don't be afraid to site specifics experiences you have had, how you have lost sales or how agencies have given up

trying to deploy vehicle repeater systems due to frequency availability. If you have experience with dealers or agencies not able to license frequencies that meet the minimum, make note of them here.

III. CONCLUSION

Provide a conclusion. For example, the conclusion can be as simple as “we support the comments by Pyramid Communications regarding the expansion of spectrum available for public safety agencies above 173 MHz, or something to that effect.

Respectfully submitted,

[Advanced PLM]

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Date: December 27, 2013