

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**

Secom Systems, located in the state of MD, pursuant to the Commission's Public Notice of September 16, 2013 <sup>1</sup>, hereby respectfully submits its comment in the above-referenced proceeding.

**I. BACKGROUND**

We are Manufacturer's Reps in the Wireless Communications industry. I have personally been in this industry since 1985, calling on Public safety agencies, self-maintained end users, utilities, and 2-way radio dealers. The use of low power on-site vehicular repeater systems has been a mainstay in the industry. It has been vital in helping to save lives, and increase productivity, while extending the range of mobile communications when needed. I have sold thousands of vehicular repeater systems over the years, and in some cases, frequency separation between the VRS and all Transmit and Receive frequencies in the existing mobile system has been a problem.

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<sup>1</sup> 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**

We support the expansion of VHF spectrum in the 173 Mhz band for vehicle repeater use. Pyramid Communications VRS units are licensed pursuant to Section 90.20(d)(34) and 90.265 of the Commission's Rules. When designing an in-band VHF VRS system, a minimum separation of 2-5 Mhz from all mobile transmit and receive frequencies is required. If this is not met, it will cause interference with the user's existing system. In a public safety scenario, this can mean the loss of lives in the heat of a crisis situation. These systems are also commonly used as interoperability communications between neighboring counties, etc. during disaster or crisis events.

Opening up additional frequencies in the 173 mhz band would provide the separation needed for a properly engineered vehicular repeater system. In some cases, we have seen waivers granted for frequencies in this range. The VRS units operate in low power (2W or less), and would not provide any co-channel interference issues if properly coordinated by APCO or the respective frequency coordinator. Some of the proposed frequencies in the 173 Mhz are being used in data Telemetry applications which are capable of safely monitoring the channel and retrying the short data burst required. Our customers would probably not have any issues paying additional fees to the coordinator to insure no interference with adjacent or incumbent channel users.

### **III. CONCLUSION**

We support the comments by Pyramid Communications regarding the expansion of spectrum available for public safety agencies above 173 MHz.

Respectfully submitted,

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