

Los Angeles County Metropolitan Transportation Authority
Application for 470-512 MHz Channels
UTC# 2003061216530601846 and 2003061217550601848

JUSTIFICATION FOR USE OF MULTIPLE CHANNELS

The Los Angeles County Metropolitan Transportation Authority (“LACMTA”) hereby submits the following justification for the use of multiple channels as requested in the above referenced applications. LACMTA recognizes that Section 90.313(c) of the rules and regulations of the Federal Communications Commission (“FCC”) generally requires that “a licensee will be required to show that an assigned frequency pair is at full capacity before it may be assigned a second or additional frequency pair.” LACMTA also recognizes that Section 90.35(e) of the FCC’s rules states that “[n]ormally only one frequency, or pair of frequencies in the paired frequency mode of operation, will be assigned for mobile service operations by a single applicant in a given area.” Even though the associated applications seek more than one frequency pair, authorization of multiple channels in this instance is required and in the public interest.

The LACMTA administers, constructs and operates the Metro system, the integrated transportation system for Los Angeles County. The Metro is comprised of:

- Metro Rail - 400 miles of light rail, heavy rail and commuter rail lines in L.A. County by 2020.
- Metro Bus - The MTA (formerly RTD) bus system, plus over one dozen municipal bus companies.
- HOV Lanes - Carpools, vanpools and express buses.
- Metro Access - Dial-a-ride services for the elderly and disabled.
- Metro FSP - Freeway Service Patrol, a system of contracted tow trucks for servicing disabled vehicles on the freeways.
- Call Boxes - A countywide system of cellular call-boxes for emergency use in the freeway and highway system.
- Bikeways - A system of bikeways for commuter and recreational purposes in L.A. county.
- Smart Streets - Synchronized signals, ramp metering and communication in order to keep traffic flowing
- TDM - Transportation Demand Management, includes rideshare, flexible work hours telecommunicating & transit voucher programs.

The system contemplated by the associated applications (the “System”) will be used to support the coordination of the current 2400 Metro Busses operated by LACMTA.^{1/} In particular, these channels will be used to support a computer aided dispatch (“CAD”) system to

monitor and direct the movement of Metro Busses. The CAD System “polls” each of the buses once a minute and based on the response of that polling, identifies the location of each of the busses. This information permits the 24 dispatchers that control Metro Bus operations to monitor and direct the movement of each of the 2400 busses. The System also permits bus operators to send a data message to dispatchers, indicating the need for voice communications between the bus operator and the dispatcher. Upon receipt of that data message, the dispatcher may initiate voice communications on other frequencies (in the 900 MHz band) operated by LACMTA. In addition to the foregoing, the System will be capable of transmitting schedule and route updates from the dispatchers to the operators and transmitting emergency signals from the operators to the dispatchers.

Multiple channels are required for operation of the System because of the number of busses involved in the LACMTA system. With 2400 busses, multiple channels are required to meet the capacity requirements of this system. Grant of this application is, therefore, consistent with the public interest.

^{1/} LACMTA will also use one additional channel from the 470-512 MHz band in the proposed system. LACMTA expects to acquire this additional channel by assignment.