

In coming before the City Council and its members, I would direct this complaint to the Sacramento City Law and Legislation Committee for the purposes of investigation of violations as described.

DM:sr 11/16/82 161

Violations consisting in gypsy cab operation whereby a single individual operates through an answering service violates the ordinance 42.6-a stating the business address shall be an office or some place in charge of your line can be contacted in person or by telephone week-days from 8:00 a.m. to 5:00 p.m. On several occasions when testing the phone number designated on the outside of Sacramento Metropolitan Cab, 455-7777, a tape recording was a type of answering response requesting that you leave a name and number to be called back by a John Armstrong. We found no person in charge for immediate emergency information or possible dispatch of cab. Hinging this violation to the FCC clause 42.9 entitled Radio Dispatch Service whereby every taxi cab shall be equipped with an operative two-way radio dispatch and, approved by FCC for commercial use, in compliance with an FCC permit, it is necessary to be coordinated by the International Taxi Association governed under the Federal laws 90.93-a. This service coordinates and issues license on taxicab frequency as assigned. It is our experience in applications for FCC licensing to operate an approved two-way radio communication network, that in requesting a particular frequency for both transmission and receiving, we were denied and issued a frequency of the International Taxi Association's choice. While under temporary licensing in the interim and the present permanent frequency we fully complied with the City of Sacramento's ordinances under a temporary licensed frequency again, issued by the International Taxi Association through the Bureau of Federal Communications. Our compliance with the City of Sacramento's ordinance was in the full interest of consumer protection. This Company has operated under costly rules, maintaining the legitimate

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Office of the City Clerk

NOV 16 1982

24-hour dispatch office with fully documented call sheets, taken by both dispatcher-phone operator, as well as driver log sheets. The gypsy cab service purports to be a vehicle to directly violate the rights of consumer protection and I yield the floor to Mr. Cassidy, Assistant Manager of Capitol City Co-op Cab Company to further advise the Board of potential problems that may arise from the gypsy cab companies.

Dennis C. Brown, Jeremiah Courtney Law Offices, Washington, D. C.
Donald Mason, General Manager, Capitol City Co-op Cab Co.,
Phone conversation. - November 16, 1982

Mason:

#2272542 - it's a phone service - that is the format - but there is no FCC license in that format.

Brown: There is one possibility, and that could be this: one could obtain - or write himself - a temporary permit in the business radio service, but must use two letters which consist of WT followed by that person's local telephone number. If they were certifying as WT 2272542, that would be an acceptable call sign for that - business service temporary format.

Mason: Our ordinance indicates that taxis must be part of an FCC dispatch system -

Brown: I think that might be stretched to say that if they are being dispatched by a telephone that was licensed as a common carrier -

Mason: What about the International Taxi Association?

Brown: The International Taxi Association is located in Rockville, Md. - they act as coordinator --- one goes to the International Taxi Association - then applies to the FCC for a taxicab license --

Mason: They would not be able to broadcast as a taxi frequency or as a taxi service?

Brown: FCC has frequencies set aside for particular purposes-- a particular set of frequencies is used for telephone maintenance only. A particular group of frequencies is set aside for taxicab companies. To get a license, one goes first to the Taxicab Association - present application for FCC --

Mason: Is it mandatory for taxicabs to operate under those frequencies?

Brown: Others are: Business radio service, taxi radio service, general mobile radio service. Fairfax County in Washington, D.C. has 250 cabs dispatched on general mobile service. There are additional ways - not economical - specialized mobile radios.

Mason: Then the ITA really does not give us a lot of protection - it isn't mandatory that you belong to the group in order to broadcast.

Brown: Other ways may not be practical. Radio common carriers provide service which is competitive with Bell. One could go to a radio common carrier, enlist their services and use them for any purposes they have. Whether that meets local ordinances I do not know. You might see if you can find out what radio frequency they're dispatching on, and I may be able to do something more to help you. Are they using a business radio frequency, or are they working through a radio common carrier?

Mason: (described call could be transferred to car from operator.)

Brown: Sounds like a radio common carrier.

LAW OFFICES
JEREMIAH COURTNEY

2120 L STREET, N.W.
WASHINGTON, D. C. 20037
TELEPHONE: 202 833-2050

JEREMIAH COURTNEY
PHILIPS B. PATTON
JACK R. SMITH
DENNIS C. BROWN

October 18, 1982

New File No. 3234

Donald Mason, General Manager
Capitol City Co-Op Cab Co.
230 C Street
Broderick, California 95605

Dear Mr. Mason:

This will acknowledge and thank you for your acceptance of our annual retainer proposal for the representation of your Company's radio system interests before the Federal Communications Commission. Your Company's name has accordingly been added to the list of taxi companies whose radio interests are followed by us on a continuing basis.

It would be well for you to check the following points of operation to make sure that your system is in accord with the FCC requirements.

- (1) Check to see that operations conform to license in all particulars:
 - (a) Base station located at address shown on license for transmitter location.
 - (b) Dispatching quarters located at address shown on license for control point.
- (2) Check to see that the Company is in compliance with Section 90.437 of the Commission's Land Transportation Radio Service Rules governing station operations in that the license for the system (or a photocopy) is posted at the control point of the station.
- (3) Check to see that you are in compliance with Sections 90.443, 90.445 and 90.447 of the Rules in keeping proper station records. A suggested form of log is enclosed which should be checked against the log records you are now keeping.
- (4) Check to see that you are in compliance with Sections 90.405, 90.407, 90.417 and 90.419 of the Rules defining the permissible

Requirement for Copy of FCC Rules

The FCC license application forms contain a certification that the applicant has a current copy of the Commission's Rules governing the radio service in which authorization is being requested. If you previously have not obtained a copy of these Rules, you now should order these Rules from the Government Printing Office.

By ordering your copy of the Rules directly, you also will be placed on the GPO mailing list to receive subsequent Rule amendments and supplements so that your manual of the Commission's Rules may be kept up to date. There sometimes is considerable delay in GPO's processing of these Rule amendments, but our retainer series meanwhile will keep you currently informed of any Rule changes made by the FCC, with appropriate explanation of the reasons for such changes.

A suggested form of letter appears below which you may use in requesting your subscription. The price is now \$17.00 for Volume V of the Rules. All checks should be made out to Superintendent of Documents.

Jeremiah Courtney
2120 L Street, N.W.
Washington, D. C. 20037

Superintendent of Documents
U.S. Government Printing Office
Washington, D. C. 20402

Dear Sir:

We wish to enter a subscription for a copy of the Federal Communications Commission Rules and Regulations, Volume V (containing Part 87 - Aviation Services; Part 90 - Private Land Mobile Radio Service; and Part 94 - Private Operational-Fixed Microwave Service), with all amendments to date and all future amendments.

Enclosed is our check for \$17.00, and we should appreciate your sending us this Rules manual as promptly as possible.

Very truly yours,

DRIVERS: DO NOT WRITE IN SHADED AREAS

DRIVER NO. 6688	C-3 NO. D	SECTION 1	REG. HOURS	O.T. AUTH BY	JOB CODE	TRIPS 24	CASH	CHARGES 260	SCRIPT	SHORT/OVER	TRIPS 28.80
TOTAL BOOK 8120	TOTAL MILES 116	PAID MILES 44	GAS PR	P.U.C. DELIVERIES	P.U.C. MONEY	PASS TO ARPT 0	PASS FR ARPT 0	MONEY FRARPT 0	ACCIDENTS	GAS G. 6.75 MONEY 8.35	UNITS 52.40
TOTAL PASS 27	DATE	SPEEDOMETER 40591	TOTAL MILES	PAID MILES 5303	UNITS 37264	TRIPS 1790	EXTRA	TOTAL BOOK 8120		LESS DED	
START TIME P 8 WA PL AON		40475	5254		87002	1766	CASH TURN IN				
END TIME P 1 S WA PL AON		116	44		262	24					

TRIP	PICK UP	TIME	DROP	PICKUP	FROM	TO	NO. PASSES	METERED	EXCESS OF
							DESCRIP	AMOUNT	METER
1	9:00	9:45	R		19th & W	2735 N	2	220	
2	9:30	9:40	S		7th W	14th E	1	260	
3	9:30	9:45	R		1500 7	5th W	1	180	
4	10:00	10:35	S		7th W	Florinwood	1	1100	
5	10:35	10:45	F		Florinwood	Med Center	1	930	
6	11:45	12:00	S		7th W	17th W	1	240	
7	12:00	12:05	R		10th K	626 J	2	160	
8	12:30	12:35	S		7th W	1st City	2	200	
9	12:30	12:35	S		7th W	1629 JP	1	240	
10	12:55	1:10	R		1581 5	2215 9	1	240	
11	12:30	1:30	R		658 Broadway	6948 Folson	1	240	

DRIVERS NAME: [Signature]

3000

DRIVERS: DO NOT WRITE IN SHADED AREAS

DRIVER NO. 0142	CAS NO. 13	SECTION 1	REG. HOURS	O.T. AUTH BY	JOB CODE	TRIPS 23	CASH	CHARGES 2190	SCRIPT 12.40 1.30	SHORT-OVER	TRIPS 27.60	UNITS 4340
TOTAL BOOK 80.50	TOTAL MILES 152	PAID MILES 37	GAS PR	P.U.C. DELIVERIES	P.U.C. MONEY	PASS TO ARPT 0	PASS FR ARPT 0	MONEY FRARPT 0	ACCIDENTS	GAS GAL 9.3	EXCESS OF METER 9.50	TOTAL BOOK 80.50
TOTAL PASS 24	DATE	SPEEDOMETER 62790	TOTAL MILES 200	PAID MILES 57	UNITS 32771	TRIPS 85	EXTRA				LESS DED	
START TIME S 6 W PI AON		62640	48	20	72554	1901						
FINISH TIME		150	152	37	217	24						

TRIP	TO TIME PICK UP	DROP	PICKUP	FROM	TO	NO. PASS DESCRIP	METERED AMOUNT	EXCESS OF METER
1	10 ²⁵	10 ³⁵	R	2909 MARCONI ²	MARCONI & FULTON	1	1 80	
2	10 ³⁵	10 ⁴⁰	R	FULTON & NORTHRUP	SACTO INN	1	4 80	
3	10 ⁵⁰	10 ⁵⁵	R	2257 HURLEY	HURLEY & FULTON	1	2 00	
4	11 ³⁵	11 ⁴⁰	R	RANCHO MARKET	4100-3 ave.	1	1 80	
5	11 ⁵⁰	11 ⁵⁵	R	800-18 ST. ²	16 & 77 ST.	2	2 00	
6	12 ²⁰	12 ²⁵	R	RIVER DALE	COMMUNITY HOSP	1	2 80	
7	12 ⁵⁵	1 00	POP	MAIN	1874-SOUTH RIVER RD.	1	(3 80)	
8	1 20	1 25	R	2209 CAPITAL	12 & J ST.	1	2 20	
9	1 30	1 35	R	TORCH	1119-21 ST.	4	2 80	
10	1 35	1 40	R	21 & K ST.	MAIN	1	2 60	
11	1 50	2 00	R	415-P ST	4700 BLUES	1	(8 60)	

DRIVERS
B. B. WILLIAMS

RF LF LR RR

DATE Nov 14 1982

RADIO DISPATCH RECORD

SHEET NO. 1

DISPATCHERS	ON	OFF
WINLAN	10 ⁴⁵ PM	6 ⁴⁵ AM
MURRY	6 ⁴⁵ AM	2 ⁴⁵ PM

CAPITOL CITY CO-OP CLASS

STATION	CALL LETTERS	FREQUENCY M	WATTS
	KAFK-97.6	152.275	
MOBILE	HOUR OPERATION		
	157-530		

National Taxicab Supply Co., S. F. - Form NO. 112

CAB NO.	TIME CALLED	TIME SENT	FROM	TO	F.	AMOUNT	T.	
1	16	12 ²⁵	✓	TURCH.	12 ²⁵	19 + E	12 ²⁵ ✓	
2	8	12 ²⁵	12 ²⁵	O.T. WILLY	12 ²⁵	19 & CAPITOL	12 ²⁵ ✓	
3	1	12 ²⁵	12 ²⁵	3318 I # 1	12 ²⁵	68 & FOLSON	12 ²⁵ ✓	
4	9	12 ²⁵	12 ²⁵	HARRY'S 42 L	12 ²⁵	MARINA INN	12 ²⁵ ✓	
5	20	12 ²⁵	12 ²⁵	VENETIAN	12 ²⁵	629 WILLIAM	12 ²⁵ ✓	
6	22	12 ²⁵	12 ²⁵	925 20	12 ²⁵	3201 STREET	12 ²⁵ ✓	
7	21	12 ²⁵	✓	12 & I	12 ²⁵	4416 7AV	12 ²⁵ ✓	
8	20	12 ²⁵	✓	7 & L	12 ²⁵	28 & I	12 ²⁵ ✓	
9	4	12 ²⁵	✓	7 & L	12 ²⁵	FRANKLIN & 44AV	12 ²⁵ ✓	
10	8	12 ²⁵	✓	12 & I	12 ²⁵	22 AV + FRANKLIN	12 ²⁵ ✓	
11	9	12 ⁴⁵	12 ⁴⁵	6891 VINA JUNIOR ^{CAMPFIELD}	12 ⁴⁵	—	12 ⁴⁵ ✓	
12	1	12 ⁴⁵	12 ⁴⁵	CL 400	12 ⁴⁵	ZEBRA	12 ⁴⁵ ✓	
13	20	12 ⁵⁰	12 ⁵⁰	FOLSON W. OF HANBET	12 ⁵⁰	36 & 22 AV	12 ⁵⁰ ✓	
14	17	12 ⁵⁰	12 ⁵⁰	BACK DOOR	12 ⁵⁰	MARINA	12 ⁵⁰ ✓	
15	78	12 ⁵⁵	12 ⁵⁵	PARKING LOT. MARK	—	NO GO	— ✓	
16	8	12 ⁵⁵	12 ⁵⁵	RED BARN ^{CONLEY BAY}	110	MENDICINO + FRUITRIDGE	12 ⁵⁵ ✓	
17	21	10 ⁵	10 ⁵	TOWER CL	115	200 2ND	12 ⁵⁵ ✓	
18	7	12 ⁰	12 ⁰	RALPH'S	130	NEW HELVETIA	140 ✓	
19	9	135	135	DEFEREST	140	5 & P	145 ✓	
20	20	145	145	DEFEREST	150	2823 U	150 ✓	
21	7	145	145	VENETIAN	150	ARTIVE DR W.S.	155 ✓	
22	21	150	✓	7 & L	150	2809 L.P.	250 ✓	
23	9	150	150	RALPH'S	—	NO GO	— ✓	
24	8	150	150	LIMBLIGHT	200	2317 1/2 L	205 ✓	
25	20	210	210	DONEGAL INN	230	CS+14AV	240 ✓	
26	9	210	210	VILLA C.R.	215	608 G	215 ✓	
27	9	230	230	2317 1/2 L	235	BIG TOP	245 ✓	
28	9	255	255	VILLA	250	801 BLDIER	300 ✓	
29	20	255	255	2615 G	300	1620 P	305 ✓	
30	9	315	315	VENETIAN	320	960 TADHUNTER	325 ✓	
31	20	325	325	10 EL CAMINO + GROVE	335	STOCKTON + P	350 ✓	
32	9	335	335	5821 24	345	CABALLO BLANCO	350 ✓	
33	20	340	350	925 30	350	50 + 9 AV	355 ✓	
34	9	345	350	SPITZERS ^{FRANKLIN}	355	CENTER + SO BAY	400 ✓	
35	20	400	400	2317 I # 3	405	30 & N	410 ✓	
36	4	440	✓	7 & L	440	BREDI	445 ✓	
37	20	455	455	SILVER FOX C.R.	505	FRUITRIDGE + WALLACE	510 ✓	
38	4	510	510	STEAMWORKS	515	R.C.	540 ✓	
39	9	515	515	1421 G # 3	525	230 C	530 ✓	
40	20	540	540	215 ALHAMBRA	550	7 & L	600 ✓	
41	9	540	540	1911 EL CAM ^{RAS}	550	CELL CAR + CRANES CR	605 ✓	
42	6	625	625	1715 N # 4	630	PULL MAIL	630 ✓	
43	6	630	630	1410 F	635	9 & F	640 ✓	
44	6	655	655	2810 H	—	26-K	—	
45	5	705	705	1437 LISBON	—	7-L	—	
46	4	710	710	GARDEN INN	—	STEADWAY	—	
47	2	705	705	70-L	—	SUTTERVILLE - DEL RA	—	
48	2	705	705	WINDMILLS FRODOPT-A	—	STOCKTON - FOUNT	—	

DATE 11/14

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RADIO DISPATCH RECORD

SHEET NO. 2

DISPATCHERS	ON	OFF
MURRY	6 ⁴⁵ M	M
	M	M

STATION	CALL LETTERS	FREQUENCY M	WATTS
MOBILE			
	MOBILE	MOBILE	MOBILE

National Taxicab Supply Co., S. F. Form NO. 112

	CAB NO.	TIME CALLED	TIME SENT	FROM	TO	P.	AMOUNT	T. C.
1	21	730	730	STEAMWORKS	610 12 ST			
2	6	745	745	SPEEDWAY BAR	410 W CAP			
3	5	750	750	CISCOS BAR	EMBERS			
4	4	755	755	7FL	EXPO			
5	16	755	755	ORSH	LAND PARK			
6	16	810	810	825 BEL AIR	EMCO RIVERSIDE			
7	21	810	810	76 GAS 43AVE CURPSE	NO GO			
8	6	820	820	2513 P 8	CARROLLS 25 ST			
9	5	830	830	2209 CAPITOL	AIRPORT - RETURN SAN FRANCISCO			
10	6	840	840	924 SA	28 ^{FL}			
11	8	845	845	HARBOR INN	CAL EXPO			
12	6	845	845	2720 3AVE	4930 24 ST			
13	18	850	850	1400 SALE	23 ST			
14	4	855	855	1750 9AVE	28 ^{FL}			
15	16	905	905	MOUNT CARLO	TORCH			
16	4	915	915	2657 2657 RIVERSIDE 2B	400 CLUB			
17	18	915	915	1500 7	5 ^{FL}			
18	8	930	930	1700 CAPITOL	14 ST			
19	5	1000	1000	3330 22AVE	2019 0			
20	21	1005	1005	HARBOR INN	1535 VERMONT			
21	13	1010	1010	2909 MARCONI #1	FULTON & MARCONI			
22	6	1020	1020	7236 GREENHAWK #97	GREENHAWK			
23	21	1030	1030	716 ELECTION PLAZA	NO GO			
24	13	1030	1030	NORTHMAP & FULTON STREET	SAC INN			
25	4	1030	1030	7FL	AIRPORT			
26	16	1035	1035	ASTRO CLUB	LIL STINKER			
27	13	1035	1035	2257 HURLEY 55	FULTON & HURLEY			
28	16	1055	1055	NEW PALACE GRILL	610 12			
29	4	1105	1105	9250 FLOYD	MADISON & HAZEL - RETURN			
30	16	1110	1110	LIL STINKER	GARDEN			
31	13	1115	1115	RANCHO MARKET	43 & 2AVE			
32	6	1135	1135	ORSH	1500 7			
33	21	1140	1140	500 N	11 ^{FL}			
34	6	1140	1140	TORCH	2 ^{FL}			
35	13	1145	1145	800 18 #2	16 ST			
36	18	1145	1145	7FL	17 & 5			
37	18	1150	1150	10 ^{FL} WJ	7 & 5			
38	6	1155	1155	ALPHA BETA FULTON - HURLEY	22-57 HURLEY			
39	21	1155	1200	7FL	OLD SAC			
40	8	1210	1210	5764 WALLACE	TUNNEL			
41	13	1210	1210	441 RIVERDALE #72	COMMUNITY HOSPITAL			
42	16	1215	1215	6EMCO NIZARD	17 ST			
43	6	1220	1220	2100 STOCKTON	1210 16			
44	15	1220	1220	7FL	RIO 110N			
45	18	1225	1225	7FL	OLD SAC			
46	16	1230	1230	1811 N #1	28 ^{FL}			
47	16	1235	1235	241 ^{YS} 28 ^{FL}	15 ST CAP			
48	18	1240	1240	7FL	12 ST			

DATE 11/14/

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RADIO DISPATCH RECORD

SHEET NO. 3

DISPATCHERS	ON	OFF
MURRY	6 ⁴⁵ AM	2 ⁴⁵ PM
EDONATED	245 PM	1045 PM

National Taxicab Supply Co., S. F.—Form NO. 112

STATION	CALL LETTERS	FREQUENCY M	WATTS
MOBILE	HOOR OPERATION		

CAB NO.	TIME CALLED	TIME SENT	FROM	TO	P.	AMOUNT	T.
1	13	1255	70L	SOUTH RIVER RD			
2	18	100	1581 S	90W			
3	13	105	2009 CAPITOL	SENATOR			
4	85	105	70L	OLD SAC			
5	8	105	70L	7873 BURLINGTON			
6	16	115	650 BONY BIGTOP	690 FOLSOM			
7	5	115	GARDENA 140	MACYS			
8	16	120	1100 39 ST	157K			
9	13	120	TORCH	210L			
10	8	130	PEW SHOP W LADY PARK	100N			
11	13	135	LIANOR 210K	70L			
12	9	140	FRONTIER HERITAGE TOURS	70L			
13	13	145	DUGOUT W SAC	SPURWAY			
14	18	145	CARRONS 285J	185N			
15	15	145	415 P PARA TRANSIT	CLUBS IT			
16	18	155	PERICAN	250 BONY			
17	8	200	AMTRACK	902 DEL PASO			
18	7	200	2215 95 027 209	1500 75T			
19	9	205	METHODIST LAB	255T			
20	13	210	CRAYHOUND MARCOSE	FULTON MARCOSE			
21	15	210	70L	ADV EXPRESS			
22	18	215	4145 43	2701 65AVE			
23	2	215	ORISIN	909 W			
24	8	220	3405 50	ALLADIS			
25	13	235	AMERICAN RIVER HOSPITAL	ARH			
26	1	235	608 675	HILLA CLUB			
27	8	246	12-7	14L	X		
28	15	246	1125 9	30			
29	19	253	12-N.C	S-W Cape	X		
30	19	254	3-C	14-2			
31	18	259	2513 Bwy	23P			
32	15	302	SI	1261 W Cape			
33	16	303	300 8	12L			
34	2	309	300	515 P			
35	18	314	3330 Sierra	D.A.	X		
36	16	317	Budnick Cafe	521 S	X		
37	2	321	300	Market N			
38	2	328	Villa Club (B)	604 Cummins	X		
39	13	332	3010 I	20P	X		
40	9	334	7L	919 W			
41	18	335	300 1000 Ave	9-L	Y		
42	12	337	AP	N. MKT Rd			
43	9	338	528 29 Pine Cove	200	X		
44	13	342	925 30	6I	X		
45	21	351	AP	Oakdale, Cal			
46	9	354	2423 C 3	4218 Stockton	X		
47	2	358	407 2630 P 1	30N			
48	18	400	7-L	10X			

DATE 11-14

1982

RADIO DISPATCH RECORD

SHEET NO. 4

DISPATCHERS	ON	OFF
LEONARD	245 P M	1045 P M
	M	M

Cap. City Corp. Club

STATION	CALL LETTERS	FREQUENCY M	WATTS
MOBILE	KJFL970	152.270	25
	HOUR OPERATION	24	

National Taxicab Supply Co., S. F. Form NO. 112

	CAB NO.	TIME CALLED	TIME SENT	FROM		TO	P.	AMOUNT	T. C.
1	18	404	406	2235 N 170	✓	20.0	X		
2	13	409	405	604 Cummings	✓	Villa Clech	X		
3	2	408	415	2109 L	✓	25K ret	X		
4	13	416	420	1125 9	✓	25K	X		
5	18	421	439	Madison Interstate	✓	Norwood - Bell	X		
6	13	439	439	17 Cap	✓	14-0	X		
7	13	445	458	Methodist Hospital	✓	2500 & Chg. # 111	X	9.50	
8	9	447	454	GARDEN N 517	✓	Junys	X		
9	18	455	510	5660 Stockton	✓	Fruit - Medicines	X		
10	13	458	509	2209 Cap	✓	AP	X		
11		510		3412 27 Ave		Cancel	X		
12	13	517	524	922 14	✓	10E	X		
13	3	525	535	1400 Burn	✓	Stockton - 15 Ave	X		
14	18	527	331	SH Club	✓	36-A	X		
15	13	530	534	2317 1/2 L	✓	1612K	X		
16	9	537	548	Argonaut	✓	no hood	X		
17	7	537	✓	AP	✓	McClellan A7B			
18	22	540	543	16N CAP VUE LOBBY	✓	18E	X		
19	18	542	542	2431 K	✓	1125 7	X		
20	3	542	552	2150 Stockton	✓	16K	X		
21	13	542	543	3620 Tmoe 7	✓	Watt EC	X		
22	13	543	606	2721 EC Walter Frank	✓	Fulton Edison	X		
23	9	553	555	1612 L	✓	1523 T	X		
24	3	559	611	Apitzera W. Sac	✓	1585 Vermont	X		
25	22	601	611	6124 Burns	✓	15-S	X		
26	9	602	615	Felimon La Rivera Donagut H	✓	4140 La Quinta	X		
27	8	605	619	1701 Esbon VFW	✓	732 Salano	X		
28	1	610	✓	AP	✓	McClellan A7B		22.40	
29	3	610	624	1797 3 Ave	✓	ORSI'S	X		
30	18	615	✓	3-C	✓	4-W Cap			
31	22	616	629	400 Cedar (22)	✓	3531 Southport	X		
32	3	627	636	19-P	✓	3008 I	X		
33	19	631	✓	AP	✓	Flour - Hwy 99			
34	1	645	647	Kings Truck (B)	✓	Broderick	X		
35	18	647	652	Astro Club	✓	Ed Stinker	X		
36	15	651	✓	AP	✓	Red Lion			
37	1	652	659	Montgomery Bay Cam.	✓	Arbun - Watt		9.00	
38	9	653	659	2342 Fruit	✓	2437 Fernandez	X		
39	12	656	✓	AP	✓	McClellan A7B	X		
40	3	657	657	1612 L	✓	626 I			
41	22	657	705	1230 N Front	✓	10-A	X		
42	6	700	✓	AP	✓	Granada N			
43	18	703	710	620 H Fancy	✓	925 30	X		
44	18	705	705	W. Cap. Nelsonson	✓	7-D	X		
45	16	706	✓	AP	✓	Red Lion			
46	17	709	✓	AP	✓	Red Lion			
47	22	710	712	ORSI'S	✓	13-Bury	X		
48	18	723	730	5660 Stockton	✓	Mitador Club	X		

DATE 11-14

1982

RADIO DISPATCH RECORD

SHEET NO. 5

DISPATCHERS	ON	OFF
LEONARD	245 PM	1045 P M
	M	M

Cap City Loop Club

STATION	CALL LETTERS	FREQUENCY M	WATTS
MOBILE	KNFL97B	152.270	25
	HOUR OPERATION	24	

National Taxicab Supply Co. S. F. Form NO. 112

	CAB NO.	TIME CALLED	TIME SENT	FROM	TO	P.	AMOUNT	T. C.
	15	724	✓	22E	✓ 12-E			
	12	730	732	1510 20	✓ 1729 H	X		
	16	731	734	Rosemont Hill	✓ 1240 47 Ave	X		
	17	734	750	4216 Stockton	✓ 2423 C	X		
	15	738	738	Smargy Bob	✓ 1606 J	✓		
	1	740	✓	7-L	✓ 21-J			
	12	747	✓	31-Folsom	✓ 15-J			
	15	750	752	DH Club	✓ 415 L 8	X		
X	12	754	755	32-J Raven Club	✓ 1447 35	X		
	1	803	803	10-A Carrow	✓ 13-N	X		
	18	803	803	10W	✓ Fremont-Riverdale	X		
	1	805	818	8911 Folsom	✓ 57-2 Ave	X		
	17	807	816	2500 70	✓ 1105 70	X		
	15	807	810	1612 L	✓ 16 H.	X		
	7	812	✓	AP	✓ Bulte			
	15	822	825	1510 20 OT	✓ 24C	X		
	18	825	828	Aster Club	✓ Speedway Bar	X		
	16	826	827	1612 L	✓ 15P	X		
	9	834	✓	AP	✓ McClellan h7B			
	1	834	835	Full Sukiyaki	✓ 1125 9	X		
	3	836	✓	AP	✓ Rodeway N			
	15	837	837	16-A 110	✓ 1220 16	X		
	18	843	846	815 Bulte 71	✓ 730 Maple	X		
	9	844	844	1320 N 104	✓ 17-A	X		
	18	850	900	Venition Club	✓ 629 Williams	X		
X	15	859	900	505 12	✓ 2557 RL	X		
	18	900	900	900 Summit 89	✓ 819 V	X		
	1	915	✓	SI	✓ 5Q			
	9	916	✓	SI	✓ 226 Alhambra			
	3	918	918	Rodeway N	✓ 2354 Oakmont	X		
	1	925	925	827 Pine 37	✓ No Hood	X		
	8	926	927	1524 J	✓ Paid No Ho	X		
	18	935	940	Woodlake N	✓ 528 Pinedale	X		
	9	939	✓	7L	✓ 13-H			
	20	940	942	Brookside Cafe	✓ No Hood	X		
	9	951	✓	7L	✓ 23H			
	1	955	✓	7L	✓ 8E			
	20	957	✓	7L	✓ 44-Fruit			
X	1	958	958	11-H	✓ 1928 L	X		
	20	1002	1011	Tribalco	✓ 53-Hesperian	X		
	18	1008	1012	Brookside Cafe	✓ 200 21	X		
	3	1011	1014	29-E Pine Cove	✓ Auden-Fulton	X		
	1	1014	1018	2267 Fairfield	✓ Arroyo	X		
	9	1016	1022	32-J Raven Club	✓ 16 P	X		
	19	1019	✓	AP	✓ Elk Center - San Juan			
	3	1020	1034	2354 Oakmont (3)	1045 ✓ KIDWAY INN	X		
	7	1021	1022	19P	✓ 615 T	X		
	20	1026	1022	5660 Stockton	1040 ✓ FRUIT & MARRONNI	X		

11-14-82

CAR COUNT SHEET

	Cabs	Short	Too Many	OK	Radio Disp.		Cabs	Short	Too Many	OK	Radio Dis
12 Midnight	12				12-1 CALLS 11 PV 5	12 Noon	11			✓	MURRY
1 AM	7				1-2 CALLS 7 PV 1	1 PM				✓	MURRY
2 AM	2				2-3 CALLS 5 PV 0	2 PM				✓	MURRY
3 AM	2				3-4 CALLS 5 PV 0	3 PM	13				2-3 Calls 9 PV 3
4 AM	3				4-5 CALLS 2 PV 1	4 PM	13				3-4 Calls 9 PV 7
5 AM	5				5-6 CALLS 4 PV 0	5 PM	11				4-6 Calls 10 PV 1
6 AM						6 PM	12				5-6 Calls 12 PV 1
7 AM	4			✓	MURRY	7 PM	14				6-7 Calls 12 PV 5
8 AM	7			✓	MURRY	8 PM	13				7-8 Calls 10 PV 6
9 AM	8			✓	MURRY	9 PM	11				8-9 Calls 11 PV 3
10 AM	8			✓	MURRY	10 PM	12				9-10 Calls 7 PV 6
11 AM	9			✓	MURRY	11 PM	10				10-11 Calls 18 PV 4
REMARKS											11-12 Calls 7 PV 3

Sunday

DRIVER'S SCHEDULE

November 14, 1982

START	END	CAB	NAME	LUNCH		START	END	CAB	NAME	LUNCH	
				Out	In					Out	In
4:30	12:30	4	Kivapitsuo			2:30	10:30	4			
—	—	14	Down			2:30	10:30	5			
5:30	1:30	5	Reynolds, R.			—	—	14	Down		
6:00	2:00	6	Alvarez			3:30	11:30	7	Egan		
6:30	2:30	7				4:00	12:00	2			
6:30	2:30	8	Breaux			4:00	12:00	6	Strickland		
7:00	3:00	2	Bowling			4:00	12:00	21			
7:00	3:00	19	Seaney	SUNDAYS OFF		4:30	12:30	19	Snyder		
7:00	3:00	21	Sosa			5:00	1:00	1			
7:30	3:30	11	Tilly			5:00	1:00	16	Gilbert		
8:00	4:00	3				5:00	1:00	17	Perry		
8:00	4:00	17				5:00	1:00	22	Martel		
8:00	4:00	22				5:30	1:30	3	Stamatelas		
8:00	4:00	1				6:00	2:00	8	Homeny		
—	—	10	Down			6:30	2:30	18	Hearsum		
9:00	5:00	18	Huddleston			8:00	4:00	13			
—	—	20	Down			8:30	4:30	9	Johnson W		
10:00	6:00	9				8:30	4:30	11			
10:00	6:00	13	Bethell			8:30	4:30	15			
11:30	7:30	11	Smith			—	—	10	Down		
11:30	7:30	15	Salin			9:00	5:00	12	Craft		
12:00	8:00	12	Kull			—	—	20	Down		
4:00	1:45	4	KWIEYANSUO			2:45	11:00	1	CASSIDY		
5:35	1:50	6	ALVAREZ			2:50	11:00	7	Egan		
5:50	2:15	5	REYNOLDS, R.			3:00	12:15	19	SNYDER		
6:30	4:25	23	BOWLING			3:40	12:45	6	Strickland		
7:10	9:20	21	SOJA			4:40	12:05	17	Perry		
7:20	3:30	11	TILLY			4:45	12:40	16	GILBERT		
7:25	3:10	8	BRADY			5:40	1:15	22	Martel		
8:50	6:00	18	HUDDLESTON			5:30	2:45	3	Stamatelas		
11:40	9:30	15	SALIN			6:15	12:50	8	GOMEZ		
12:00	7:15	9	SMITH			6:15	12:55	18	HEARSUM		
11:30	9:00	12	KULL			8:30	6:20	9	W. JOHNSON		
10:00	6:30	13	Bethel			9:15	6:20	20	CRAFT		

FCC's RULES GOVERNING
INTERCONNECTION OF PRIVATE LAND
MOBILE SYSTEMS AND PUBLIC TELEPHONE NETWORK

Introduction

The FCC has adopted regulations governing the circumstances under which private land mobile radio systems operating below 800 MHz may be connected with both public and private telephone systems. The rules cover the following major categories:

- ° General provisions relating to transmitter control, including "dial-up" control circuits
- ° Internal or private telephone system interconnection
- ° Public Switched Telephone Network interconnection below 800 MHz
- ° One-way paging interconnection

The rules also include a revision of §90.389 which governs Public Switched Telephone Network interconnection at 800 MHz.

The rules adopted in each of the above areas are discussed in detail below. Because of the length and detail of the rules, we have also prepared a capsule summary for general information purposes.

Capsule Summary

DIAL-UP TELEPHONE CONTROL CIRCUITS are allowed where (1) each dial-up point is a licensed control point and (2) special encoding circuitry is installed to limit access to the transmitter being activated only to authorized control points

PRIVATE TELEPHONE SYSTEMS AND PBX's may be connected with two-way transmitters where access to the transmitter is limited to the private telephone system and where certain technical measures are taken to prevent interference to co-channel users

GENERAL PSTN-PRIVATE TWO-WAY RADIO SYSTEM INTERCONNECTION is permitted, subject to a number of restrictive conditions:

- (1) No interconnection is permitted within 75 miles of the top 25 urban areas in the Business, Automobile Emergency, Special Industrial and Taxicab Radio Services and non-450-470 MHz Special Emergency Radio Service systems
- (2) No interconnection will be permitted stations in either the General Mobile (formerly Class A Citizens) or Industrial Radiolocation Radio Services
- (3) Both manual and automatic interconnect of two-way systems, unless otherwise prohibited, will be permitted, subject to restrictions to insure control of the radio system remains with the licensee
- (4) Common point interconnection is forbidden on multiple-licensed "community repeater" systems but permitted in bona fide cost shared multiple user systems

ONE-WAY PAGING STATIONS may not be directly interconnected with the Public Switched Telephone Network. Thus, connection of an automatic paging terminal to the PSTN is not permitted under any circumstances either with or without operator supervision. Access to a paging transmitter from a licensee's internal or private telephone system, e.g., a plant-wide PBX, is permitted, however, as is use of "dial-up" control circuits from authorized control points

COMPLIANCE with the new rules is mandatory for all systems licensed after October 16, 1978. Existing otherwise lawful systems may continue operating under the old rules until January 1, 1984

INTERCONNECTION OF 800 MHz SYSTEMS is to be the subject of a further rule revision. However, the existing interconnection rule is reworded to clarify the prohibition on common point interconnection

Dial-Up Control Circuits

The new rules permit a licensee to remotely control a transmitter by use of a telephone "dial-up" control line. However, significant restrictions are placed on use of dial-up lines:

- (1) The dial-up circuit may only link control points^{1/} specified on the station license and the remote transmitter. A dial-up control line may not be used if the facilities are to be operated from dispatch points;^{2/}
- (2) The dial-up encoder and the equipment at the remotely controlled station (typically an auto-dialer) must be so configured that only authorized control points may access the transmitter and that only authorized control points may be reached from the mobile.

The rule continues, and codifies, the FCC staff's prior sanction of dial-up control circuits for transmitter remote control and continues the staff's distinction between use of the PSTN for control and interconnection with the PSTN. However, in order to comply with the restrictive terms of the rule, systems are required to use protective devices heretofore only "recommended" by the staff, such as uniquely coded signalling systems, to insure that only authorized control points may activate the remote station.^{3/} Furthermore, mobile units are restricted to reaching only specific telephone numbers -- those of the station's authorized control points, such as by use of a tone activated auto dialer at the remote station. Finally, the rules do not discuss dial-up remote control of multiple licensed or shared transmitters. In the absence of the specific requirement found in the general interconnection rules that each interconnected party have a separate, exclusive telephone number, we believe the FCC's intent, as long as each licensee's mobile unit can reach only its own control point and as long as transmitter access is limited to only each licensee's control point, is to permit a single, shared, dial-up control line to be used.^{4/}

-
- 1/ A control point is now defined as "any place from which a transmitter's functions may be controlled."
 - 2/ A dispatch point is now defined "any place from which radio messages can be originated under the supervision of a control point."
 - 3/ The FCC requires that some special "security signal" be used once the PSTN connection has been made between the control point and the transmitter, to gain control of the transmitter. This security signal usually takes the form of a particular combination of audio tones. The FCC requires that it be a signal which cannot be obtained from a standard Touch Tone pad, such as those in pay telephones.
 - 4/ In informally discussing use of a common telephone number for dial-up remote control of a multiple licensed transmitter with FCC staff members responsible for drafting the rules, we obtained differing opinions on whether such a practice was intended. Certainly, our analysis of the text of the rule reveals no prohibition on common use of a single telephone number for dial-up control. However, local telephone company tariff provisions may prohibit common use of a single telephone by non-related parties.

Private Telephone System and PBX Control

Many large industrial and commercial users have private intra- and inter-plant, internal telephone systems, either using owned or leased facilities. Some have PBX or CENTREX or other similar systems for intra-plant or office use. Under the FCC's rules such private, internal telephone systems may be connected with a licensee's one-way paging or two-way radio systems.

To be connected under the "internal systems" provision of the FCC's rules, the following circumstances must be present:

- (1) The telephone system must be an "internal" one, i.e., it must limit transmitter access to points on premises owned or controlled by the licensee;
- (2) One of two options for system control must be met;
 - (a) The system is under the supervision of a control operator at a fixed point, equipped to monitor both radio and land line traffic going over the system and capable of shutting down the transmitter if necessary; or
 - (b) The system may be operated without a supervisory control operator on duty if the following criteria are met:
 - (i) All operating positions are on premises owned or controlled by the licensee;
 - (ii) PSTN dial-up circuits may not be used; nor can the radio system be designed so that it is accessible from the PSTN;
 - (iii) Automatic monitoring and timing equipment must be brought into the system to minimize interference to co-channel users.

A review of the language of the rule as well as the FCC's explanation of its reasons for adopting its "internal systems" connection rules do not indicate an intent to forbid multiple-licensed shared systems, where each licensee's private telephone system is connected via dedicated facilities to a common transmitter. Consequently, so long as each licensee can satisfy all of the provisions relating to the internal system rules, connection of a multiple-licensed transmitter to the internal telephone systems of each licensee appears permissible.

General PSTN-Private Radio System Interconnection

Interconnection is defined, under the new rules, as:

"Connection, either through automatic or manual means, of private systems of radio communication with the facilities of the public switched telephone network to permit the transmission of messages or signals between points in the public telephone network and persons or points served by the private radio system."

Interconnection of two-way radio systems operating below 800 MHz is permitted, subject to a large number of conditions and restrictions. Perhaps the most significant of the restrictions is that no interconnection will be permitted stations licensed in the Business, Special Industrial, Automobile Emergency or Taxicab Radio Services operating on any frequency below 800 MHz and Special Emergency Radio Service stations operating on frequencies not in the 450-470 MHz band, if the station is within 75 miles of the center of the 25 largest population urban areas, a list of which areas is appended hereto. Interconnection is totally forbidden stations licensed in the General Mobile Radio Service (formerly Class A Citizens Radio Service) and in the Industrial Radiolocation Service.

Other requirements which new systems must comply with are:

- (1) Any application proposing interconnection must include a complete description of the "equipment, devices and techniques to be used to accomplish interconnection to show compliance with the applicable provisions of the rules . . .";
- (2) A licensee proposing to interconnect may accomplish control through a number of options:
 - (a) Manually, by a control operator at a fixed control position if the following conditions are met:
 - (i) All calls are directed through the control operator; and
 - (ii) The control operator monitors all messages to insure that only communications permissible in the licensee's radio service are exchanged.

- (b) Automatically, under the supervision of a control point operator at a fixed point if the following conditions are met:
 - (i) The control operator must monitor all messages to insure that only communications permissible in the licensee's radio services are exchanged; and
 - (ii) The base station has a co-channel "lock-out" feature to prevent interference if other stations are using the channel.
- (c) Automatically, under the supervision of the mobile station operator, if the following conditions are met:
 - (i) The base station has a co-channel "lock-out" feature to prevent interference to other stations using the channel;
 - (ii) An incoming call from the PSTN may cause only a brief (3 seconds or less) alerting signal to be transmitted and that, until a mobile unit transmits an acknowledgement signal, no further base station transmission can be made;
 - (iii) If a duplex system is in use, the mobile must be able to terminate interconnection at any time;
 - (iv) If a simplex system is in use, a timer must restrict PSTN transmission to 30 seconds in length, at which time a 3-second monitor period must occur; and mobile units must be capable of disconnecting the calling party during the monitor period;
 - (v) Except for stations licensed in the Police, Fire, Local Government, Special Emergency, Power, Petroleum, and Railroad Radio Services, communications must be limited by a timer which will automatically disconnect the transmitter from the PSTN after 3 minutes of communications.

In summary, the two-way interconnection rules recently adopted apparently are intended to prevent the abuses, e.g., long transmission and personal telephone calls, that a number of commentators believed could result with unrestricted interconnection.

Additionally, the rules modify the FCC's prohibition on common point interconnection of multiple user radio systems. Under the "interim" rule adopted, pending further action, interconnection at a common point (usually the remotely controlled transmitter or common telephone answering service dispatch agency) will be permitted only where systems are shared on a "cooperative, cost-sharing, non-profit arrangement" and where the equipment supplier does not influence the operation of the system. (In a cooperative cost-shared system, a single entity usually holds the licenses required for the system and would receive permission from the FCC to render services to other eligibles on a non-profit or no-charge basis.) Specifically forbidden common point interconnections are systems "where third parties are involved as in the so-called community repeater arrangements." Furthermore, in those cost-shared systems where common point interconnect is permitted, each interconnected licensee must have a separate interconnect telephone number; a single number cannot be shared by different users.

Applicability of Land Mobile Interconnection Rules to Systems Involving Operational Fixed Facilities

Many users asked that the Commission clarify its Rules with respect to interconnection between operational fixed (point-to-point communications) stations and the PSTN. The FCC explained that, where an operational fixed system is not used to facilitate communication with mobile units, interconnection with the PSTN is restricted, if at all, only by the telephone company's tariffs and not by its Rule Sections 90.477, 90.481 and 90.483. For example, a point-to-point system installed to communicate between a remote mine and a nearby headquarters office constitutes a fixed system not used to facilitate communications with mobile units; no FCC Rule restrictions and very likely no telephone company tariff restrictions apply to interconnection with the PSTN.

One-Way Paging

The rules limit tone only or tone plus voice paging for stations operating in the 800 MHz band to those systems only which have sufficient mobile units actually in service to qualify for an exclusive frequency under the FCC's 800 MHz channel loading standards. This new rule drastically limits the use of the 800 MHz band for private user paging purposes and effectively protects the bulk of the common carrier paging market made up for the most part of subscribers using one or two pagers. One-way paging stations operating below 512 MHz are subject to a number of new restrictions:

- (1) The paging signal and message must be transmitted (apparently manually) by a control operator from a fixed control point; unless
- (2) The paging signal and message are transmitted through a licensee's internal system of communications; or unless
- (3) The paging signal and message are transmitted from a "dispatch point" (which cannot be a station in the PSTN) subject to supervisory control by the control point operator.

If dial-up control circuits are involved in any part of the transmitter control system, only manual paging from a fixed control point may be employed. The rules then go on to include the following prohibition:

"Paging signals, as such, may not be transmitted from telephone positions in the public, switched, telephone network, notwithstanding the fact that the radio system employed may be interconnected with the public telephone network and meet the conditions set out at §§90.477-90.483."

Fully automatic interconnected paging systems connected to the PSTN are not permitted and the FCC has indicated that no waiver of this rule will be granted. Where, however, the automatic paging terminal is accessible only from a private PBX or other internal communications system, such operations are not defined as "interconnected" and are permitted, subject to compliance with the FCC's "internal system" rules.

800 MHz Interconnection

Under the rules, the present restriction on common point interconnection of 800 MHz systems is retained but language has been added to the rule to make it clear that the rule forbids "interconnection at a common location, used for dispatching or for control, by the licensee together with other licensees or users, such as, a telephone answering service."

The FCC noted, in adopting its current rules, that it had "decided to consider further the scope of interconnection of private radio systems in the 800 MHz bands and our decision on this matter will be announced in a further action in the near future."