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LUBRIZOL

Fluid technologies for a better world™

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May 2, 2002

Federal Communications Commission
Washington, DC 20554

Reference: Notice of Proposed Rulemaking (WT Docket No. 02-55)
Improving Public Safety Communications in the 800 MHz Band

The Lubrizol Corporation is a global fluid technology company and a member of the American Chemistry Council and National Association of Manufacturers. We are strongly opposed to any proposal that would:

- put at risk the safety and security that our existing 800 MHz radio system provides to both our employees and the over 47,000 living in the communities (within a 2-mile radius) in which we operate; or
- require the purchase of replacement equipment or frequencies. The current direct cost for new equipment would be $1,500,000. This is an unnecessary and non-productive expense that we cannot afford in today's difficult economic environment.

Lubrizol always has been proactive in addressing the security and safety needs of its employees and the community. Our 800 MHz radio system is the costly cornerstone of our entire safety and security system. Any changes that would disrupt this system or require us to purchase another system would be unfair and could place thousands of people at risk.

Nextel's proposed plan to move certain entities to alternate bands is, at best, disruptive and has the potential to adversely affect our employees' safety. Suffice it to say that if a certain communications corporation has caused interference on a particular frequency, it would be that company's ethical and moral responsibility to research the problem and implement a solution, rather than push to cause undo stress on many companies to move to another frequency.

To give you a little background, Lubrizol's Ohio facilities include a primary research and development site and a chemical manufacturing plant. In both facilities, employees work with a variety of chemicals used in formulating compounds related to transportation products and industrial applications. Engine testing requires the bulk storage of gasoline and diesel fuel. Two railroad corridors border an 88-acre site and a 79-acre site providing a steady flow of trains transporting assorted hazardous cargoes.

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Lubrizol's Ohio chemical manufacturing plant is one of many production facilities the company operates around the world. This facility produces and ships products at volumes of 60 rail cars and 200 tank trucks per month. We separate protecting these facilities, the employees and the surrounding communities into three disciplines: security, prevention and emergency response.

Our security group mans seven access gates during normal business hours and two command centers 24 hours a day, 7 days a week, in addition to constantly patrolling the facilities. Our command centers receive all fire alarms and 9-1-1 emergency calls, and security personnel are responsible for dispatching emergency responders and providing them with up-to-date information.

Prevention focuses on process safety, fire prevention, housekeeping, employee training and recordkeeping. The company's emergency response organizations provide 24-hour immediate response to site incidents, which include medical emergencies, fires, chemical spills and releases. We also provide mutual aid assistance to the county. During an emergency, additional resources are frequently called on to assist first responders. Resources include:

- chemical operators
- environmental engineers
- facility electrical and mechanical service employees
- facility emergency management team
- local city fire department (a number of their radios have been programmed with a channel from our system)
- local hospital
- medical department (nurses and doctor)
- security

Facility emergency responders are knowledgeable of building layouts and chemical storage areas as well as the various processes conducted throughout the facility. **Radios play a vital communication role for these response teams and associated contacts**. In addition, many responders are trained as emergency medical technicians. Facility-maintained ambulances allow transportation to the local hospitals during weekday shifts when more than 1,800 employees, contractors and visitors are present. We have three foam equipped fire trucks for fighting chemical and petroleum based fires. Our local county fire departments do not have this type of equipment.

An integral component in our communication systems is our trunked radio system, which uses nine, 800 MHz channels with over 500 radios communicating among 60 talk groups. Along with the safety and security groups, other users on the system include maintenance shops, service groups, engineers, computer support, chemical operators and environmental personnel. All safety and security radios have priority over all other radios when competing for system resources. In addition, all radios are configured with a direct channel to our security command centers. Our emergency response officers also scan this channel. Anyone carrying a radio can instantly communicate an emergency situation to safety and security personnel. Messages also can be broadcast to all radios on the system simultaneously from select radios. In the event a system fails, all our safety and security radios (and many others) have the capability to perform conventional communications. While performance is reduced in this mode, it does provide us a contingency plan for maintaining critical communications.

Aside from the benefits of improved emergency communications, the productivity and efficiency among the various groups using radios has increased considerably. **We are averaging 5,000 calls per business day on these systems.** In the past, foremen and supervisors had to rely on pagers and PA systems to contact workers. This meant that a worker had to stop what he or she was doing, find a telephone and call the foreman. Today, workers stay on the job longer, and managers are not tied to their telephones waiting for calls to come back. It also is very advantageous to be able to talk to all members in a talk group in one call instead of having to call each person individually. We also have installed telephone interconnect capability on our system. This allows select users to access our PBX system and place and receive telephone calls with their radios, adding even more efficiency to their communications.

We have spent approximately $1,200,000 on equipment and over $100,000 on labor to configure, modify and program the system equipment over the last seven years. This investment has resulted in an extremely efficient and versatile communications system that has become an integral part of the overall operation of our facilities. We respect the Federal Communications Commission for diligently investigating all possible solutions in this matter in an effort to determine a solution that is fair to all concerned.

Sincerely,

Joe E. Hodge
Joe E. Hodge
Vice President – Operations

Charles P. Cooley
Charles P. Cooley
Vice President and
Chief Financial Officer