Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Review of the Commission's Part 95 Personal Radio Services Rules	)	WT Docket No. 10-119
	)	
	)	
Petition for Rulemaking of Garmin International, Inc.	)	RM-10762
	)	
	)	
Petition for Rulemaking of Omnitronics, L.L.C.	)	RM-10844

COMMENT OF JASON BOWMAN ON THE
DRAFT REPORT & ORDER TO REVISE THE
PERSONAL COMMUNICATION SERVICE RULES

My name is Jason Bowman. I am both a licensed amateur radio operator (WG8B) and GMRS radio operator (WQZF899). I support numerous Public Service Events as an amateur radio operator and participate in Citizens Emergency Response Teams (CERT). I have several comments on the draft Report & Order to revise Part 95, including what I hope is an error of omission.

In paragraph 95.1763(c), portable hand-held radios appear to be excluded from the 467MHz main channels, which are the repeater input channels. This draft would then appear to exclude the use of portable hand-held radios from using GMRS repeaters. Although my CERT group does not use a repeater, I am aware of CERT groups that do. Not being able to use portable hand-held radios with repeaters would greatly diminish the utility of GMRS as a method of communication for CERT teams. My experience with Public Service Events demonstrates that simplex communications with portable hand-held radios is not reliable, especially in urban environments where CERT would likely operate. And CERT teams are not about to hand carry mobile radios. Also, excluding portable hand-held radios would require the purchase of more expensive mobile radios to access repeaters in the general case.

If one of the goals was to define power levels for portable hand-held radios, I believe there is a missing piece of information. When sketching out the proposed rules, power levels for portable hand-held radios are not explicitly defined for the 462 MHz main channels. Therefore, it could be assumed that portable hand-held radios could theoretically transmit up to 50W on the 462Mhz main channels. Elsewhere the proposed rules either specify 5W (462 MHz interstitial) or 0.5W (467MHz interstitial).

I disagree with the Commission's proposed limitation on position reporting and text messaging limitations to simplex communications only, limiting operations to portable hand-held radios,

and to require radios to have non-removable antennas. In the Amateur Radio Service, Automated Packet Reporting System (APRS) has indeed been the source of its own interference. But that is because amateur radio operators typically use automated transmissions vice manual, make use of digipeating, and sometimes do not carefully select their WideN-n parameters. It is my opinion that requiring manual initiation of position reports and text messaging, which the Commission already proposed, is sufficient to prevent interference. Furthermore, when coupled with the proposed short duration (1s), I see no reason why to limit this capability to portable hand-held radios with non-removable antennas. I cannot envision the interference that the Commission does. The proposed rules would greatly diminish the utility of position reports and text messaging for CERT teams when supporting emergency operations. If CERT teams cannot get position reports and text messaging out beyond simplex range, there is greatly diminished utility. Extending that thought, not having this capable in mobile radios also diminishes the utility of these capabilities. Requiring manual initiation and limiting transmissions to 1s should allow adding repeating capability as well as use by mobile radios without causing interference.

Finally, I believe the Commission needs to establish a framework to allow for digital voice modes on GMRS. While the Commission was correct in not specifically allowing DMR (because there are other competing digital technologies), I believe the Commission erred in not recognizing the need for some type of framework to allow for digital voice modes, at least on an experimental basis to better understand whether the Commission's concerns are valid or not. As the Commission probably understands, there are benefits to digital voice such as clarity and allowing for more channels if the Commission ever considers moving to narrowband FM on the main channels. In addition, with the split between FRS and GRMS radios being proposed, while the average consumer is not likely to care about analog vs. digital on FRS, users of GMRS are more likely to desire digital voice modes as time goes on.

Respectfully Submitted on 16 MAY 2017,

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