

**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
)	
1998 Biennial Regulatory Review – 47 C.F.R. Part 90 – Private Land Mobile Radio Services)	WT Docket No. 98-182 RM-9222
)	
Petition for Rulemaking of Garmin International, Inc.)	RM-10762
)	
Petition for Rulemaking of Omnitronics, L.L.C.)	RM-10844

REPLY COMMENTS OF REPEATERFINDER, LLC

RepeaterFinder, LLC (a.k.a. “myGMRS.com”), pursuant to Section 1.415(c) of the Commission’s Rules and Regulations, 47 C.F.R. §1.415(c) respectfully submits these reply comments to the Petition for Partial Reconsideration¹ of the Report and Order adopted to revise the Part 95 Personal Radio Services regulations² filed by Motorola Solutions, Inc. (hereinafter “Motorola Solutions”). In this *Recon Petition*, Motorola requested the Commission to reconsider the decision to not allow automatic or periodic GPS and data transmissions in the General Mobile Radio Service (GMRS).

RepeaterFinder hereby supports the *Recon Petition* and believes it is in the best interest of the GMRS community to permit automatic data transmissions, provided some additional restrictions are put in place to prevent unwanted interference to other stations. Based upon careful consideration of the benefits and drawbacks of Motorola’s request and their impact to the GMRS community, RepeaterFinder calls upon the Commission to require the following restrictions before granting the *Recon Petition*:

¹ Petition for Partial Reconsideration, Motorola Solutions Inc., WT Docket No. 10-119, submitted September 28, 2017 (Recon Petition).

² Review of the Commission’s Part 95 Personal Radio Service Rules, WT Docket No. 10-119, Report and Order, 32 FCC Rcd 4292 (2017) (Report and Order).

1. A Busy Channel Lockout (BCL) feature be required before an automatic transmission occurs to ensure the device will not cause unintentional interference to other stations currently using the channel. The device must inhibit the automatic transmission until the device detects the channel is free, after which it may then transmit the desired data.

We believe the technology sufficiently exists, evidenced by its ubiquitous nature in many brands of two-way radios, and we believe it does not impose a financial hardship on Motorola Solutions or other manufacturers which may implement automatic transmissions. In fact, this feature would also serve the manufacturers' best interest by preventing a transmission to occur while there is co-channel activity which may hinder a compatible receiving device from being able to properly decode the transmission.

This also ensures compliance with § 95.359 which requires operators of Personal Radio Service stations to cooperate in the use of channels to avoid interference and make efficient use of the shared channels.

2. The automatic transmissions should be limited to the 462 MHz GMRS frequencies, thereby preventing interference to repeater input frequencies in the 467 MHz range. Automatic data bursts on repeater inputs would likely have a negative impact due to the increased range which repeaters cover and may prevent licensees from utilizing the service effectively. We believe this would manifest as a higher incidence of complaints from repeater owners to the Commission about harmful interference and would become a burden on the Commission's Enforcement Bureau.
3. Duty cycle limits be set by the Commission to limit the number of *automatic* transmissions in a given time period. RepeaterFinder does not propose a specific duty cycle, however we note the parameters proposed by Uniden America Corporation in an *ex parte* filing³ in 2015 in which Uniden proposed that automated messages be limited to no more than once every 2 minutes and no more than 5 seconds in duration. We believe

³ *Ex Parte* Letter from Gregg P. Skall, representing Uniden America Corporation, WT Docket No. 10-119, submitted June 11, 2015

automatic transmissions with a higher periodicity or duration than proposed by Uniden would be detrimental to the service and would have the serious potential to cause unwanted interference to other licensed operators. Further, Motorola Solutions supported reasonable duty cycle limits in their letter to the Commission⁴ in January 2018.

We also note that § 95.1787 already contains requirements governing the periodicity of data emissions but that these were designed with manual operation in mind where the operator is required to not cause harmful interference to other stations. In an automatic transmission scenario, these limits are not sufficient to prevent interference if a Busy Channel Lockout (BCL) feature is not employed as described above.

These restrictions would be essential to preventing unwanted interference and channel congestion in a service that in many areas is already quite busy while enabling manufacturers to employ new technologies for the benefit of licensees in the GMRS. It is our belief that the successful implementation of these proposed rule changes could be a segue into permitting digital voice emissions in the future in the GMRS, keeping up with technological advancements popular in the other services. We respectfully urge the Commission to impose these common-sense requirements when it considers granting the *Recon Petition* from Motorola Solutions.

Respectfully Submitted,

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President
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⁴ Further Comments of Motorola Solutions, Inc., WT Docket No. 10-119, submitted January 8, 2018