

**Leon Lewis**  
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OCTOBER 2nd, 1992

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Comment  
ORIGINAL FILE

MR. ERIC MALLINEN  
SPECIAL SERVICES DIV.  
FEDERAL COMMUNICATIONS COMMISSION  
2025 "M" Street, N.W. / RM. 5322  
Washington, D.C. 20554

CF: U.S. Senator Richard G. Lugar / Indiana  
U.S. Senator Dan Coats / Indiana  
Congressman Andy Jacobs Jr. / 10th District Indiana  
James D. Cain, K1TN, Senior Editor

Dear Sir:

In order to express what we consider to be a total disruption of Amateur operations in and around 14.295 MHz on the 20 meter Amateur band, please refer to the FCC Rule Book, Subpart E, Part 97.113, Paragraphs A through D, in particular, Paragraph C.

An exemption to this rule was given to Amateur Radio club station, WA3NAN, located at the Goddard Space Center, Maryland. Club members at this station operate in and around this frequency during each and every space shuttle mission after the Challenger disaster. Their operations are strictly rebroadcasts of air-to-ground communications between Mission Control in Houston, Texas and the space shuttle. The only other operation emanating from this station is a CW identification.

The 20 meter Amateur band is a world-wide band and is extremely crowded through-out the day with net and DX activity, rag chews and traffic handling. These activities are ongoing within the limited band (350 KHz).

Our objection to WA3NAN's rebroadcasting of space shuttle activity is two fold:

1. The interest in shuttle rebroadcasts is limited and the number of Amateurs adversely affected by this type of operation is very great. Approximately 3000 hams belonging to and associated with the OMIK Electronic Communications Association conducts its net operations and traffic operations on 14.295 MHz daily. OMIK is a predominately Black Amateur group and has been in operation since 1952.
2. Broadcasting, as defined by Part 97.113, C is not part of Amateur operations except in emergency situations and these routine shuttle missions clearly are not emergency missions.

Please consider our petition to rescind the exemption of Part 97.113 to WA3NAN on the grounds mentioned in the preceding paragraph. Shuttle rebroadcasts are occurring through-out the Amateur spectrum, but the situation on 20 meters is unique because of the propagation characteristics, bandwidth and operation density.

Sincerely,

Leon Lewis, NA9Y, Member  
OMIK Amateur Electronics Communications Association, Inc.

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