

MICHAEL LONNEKE

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November 13, 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
Room 222
1919 M Street, N.W.
Washington DC 20554

RE: Docket 92-136

Dear Ms. Searcy,

Please find enclosed, an original and five copies of
Reply Comments which I am submitting to the Commission
in connection with Docket 92-136.

Sincerely,



Route 1, Box 147
Round Hill VA 22141-9102
Home Telephone: (703) 554-4500

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BEFORE THE FEDERAL COMMUNICATIONS COMMISSION FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

REPLY COMMENTS
of Michael D. Lonke

FCC MAIL ROOM

RE: Docket 92-136
November 13, 1992

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I am asking the Commission to dismiss without action, proposals by the National Association of Broadcasters and the Radio Television News Directors Association (Docket 92-136), under which the Commission would relax its rules governing use of Amateur Radio communications by news organizations.

Perhaps there has never been a more self-serving idea put forward by the NAB and RTNDA. With news budgets shrinking and smaller news staffs it only goes to reason that stations/networks would look to outside news sources which could be tapped at no expense. Tuning into and retransmitting materials (taken at face value) from the amateur bands would be a lot more cost effective than mounting a full scale effort to field reporters before, during or after disasters.

Given the good and helpful nature of most amateurs and the propensity of others to act in the most officious manner when the opportunity exists, I can foresee so-called "media service nets" or "media service frequencies" popping up on the amateur bands after any hurricane. This would provide any station or network with a shortwave receiver and tape recorder, voluminous amounts of unverified, unofficial, and perhaps fictitious accounts of events real and imaginary.

As for an historical precedent to judge how amateurs behave when "human life is threatened, the information is directly related to the event and the information cannot be transmitted by any other means of communication" (the three NAB/RTNDA conditions), the Commission's own Monitoring Stations should be able to document for the Commission, the horrendous activities now extant (on 14.313 MHz) on the twenty-meter amateur band. This is the result of harassment by amateurs of a public service amateur network whose aim is aiding small ships at sea and deployed military personnel. Opening up the ham bands "for the picking" to the news media will be a serious mistake and will present additional targets for those who disrupt communications without regard for rules or human life.

RE: Docket 92-136
Reply comments of
Michael D. Lonneke
November 13, 1992

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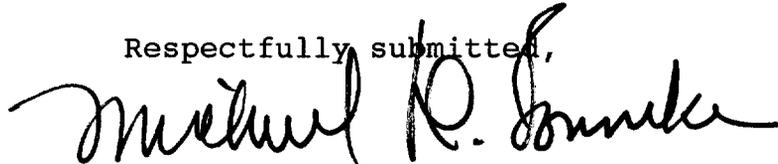
Who would verify the NAB/RTNDA qualifiers that human life is threatened or that information cannot be transmitted by any other means? Surely not the Broadcast stations and networks! These entities do not operate "without pecuniary interest" as amateur stations must. If an amateur may not order a pizza over the air, because the pizza restaurant would make money, why should he be permitted to provide information (knowingly or unknowingly) to a commercial station or a network, which is a for-profit concern?

Finally, on balance there is no damage to the public interest if news organizations continue to rely on presently available news sources. The alternative of turning the amateur bands into "instant information bands" after any disaster is ill-advised. Such a change would produce amateur stations "broadcasting" details, descriptions and accounts both solicited and unsolicited, just for the excitement of possibly part of the evening news.

I respectfully ask the Commission to reject the NAB/RTNDA request for the reasons set forth above.

I am a member of the NAB, a former member of Board of the Directors of the RTNDA, a former Radio station news director, vice president and general manager (KCMO/KHOW/WMAQ/WKQX), and have been a licensed amateur radio operator since 1963 (Amateur Extra Class License WOYR).

Respectfully submitted,



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