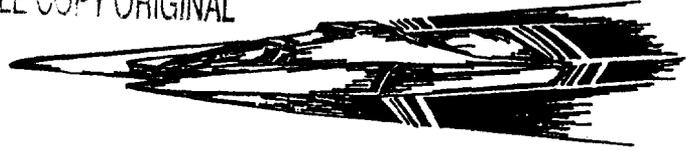


Hydro Sport Marine Products™

DOCKET FILE COPY ORIGINAL



January 18, 1993

Federal Communications Commission
1919 M Street NW
Washington, DC 20554

RECEIVED

JAN 22 1993

FCC MAIL ROOM

RECEIVED

JAN 25 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Sirs:

I am one of the largest hobby manufacturers and also sell retail many radios, radio-controlled models and similar related products. Our primary business though, is the manufacturing of roughly 50 different R/C marine hulls and over 700 hardware items and related products. Although we have only been in business for about 6 years, I have been an R/C modeler, primarily R/C boats, for nearly 24 years now.

I have been made aware that the FCC is considering action on a proposal that mostlikely will destroy my business and livelihood, in addition to countless other businesses nationwide. The proceeding is PR Docket 92-235.

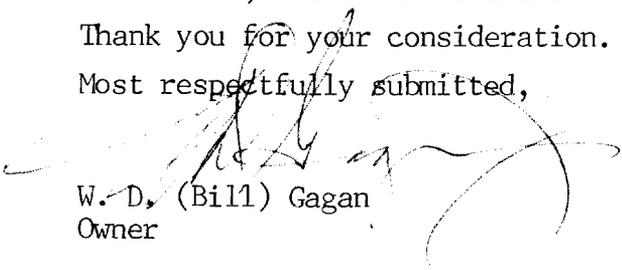
Your Notice of Proposed Rule Making (NPRM) in PR Docket 92-235 replaces Part 90 of your rules with a new Part 88. Part 90 allows the SAFE USE of R/C aircraft and surface models by keeping 10 KHz spacing between fixed commercial users and the frequencies used by R/C enthusiasts. The new Part 88 will allow MOBILE USERS, WITH HIGHER TRANSMITTING POWER on frequencies within 2.5 KHz of the frequencies available to us, thus eliminating the SAFE USE OF AT LEAST 31 of 50 CHANNELS on the 72 MHz band, and 10 OF THE 30 FREQUENCIES on the 75 MHz band now used by R/C modelers who number into the millions! As a matter of fact, it is very possible that even more channels will be affected than those mentioned herein.

If this rule is adopted, it will interfere greatly with the small number of usable frequencies currently assigned for R/C model use and worst of all, will increase the likelihood and risk of serious accidents and user liability. A significant safety risk is not the only thing that will result from adoption of this rule, additionally, it will devastate a billion dollar industry. For myself and my company, that specializes exclusively in R/C sales, passage of this rule will bankrupt me and I'll lose everything!

I urge you to reconsider this action. **Keep 10 KHz spacing between all frequencies on the 75 MHz and 72 MHz frequencies available for SAFE USE by R/C enthusiasts.** Please don't eliminate this sport and hobby that has grown tremendously over the past 30 years and has so much investment of money and enjoyment of millions of people nationwide, and even worldwide.

Thank you for your consideration.

Most respectfully submitted,


W. D. (Bill) Gagan
Owner

1308 CAPITAL #8, PLANO, TEXAS 75074 USA (214) 422-7065

"High Quality/Performance R/C Marine Products"

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JAN 25 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

1365 West Grand Avenue
Chicago, IL 60622 Fax: (312) 829-9712
20 Jan 93

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JAN 22 1993

FCC MAIL ROOM

The Honorable Daniel Rostenkowski
U.S. House of Representatives
Washington, D.C. 20510

Re: Federal Communications Commission PR Docket 92-235

Dear Congressman Rostenkowski,

The abovementioned docket number refers to a radio frequency re-distribution proposal currently under consideration by the FCC. If adopted, the proposal would seriously compromise the viability of frequencies presently assigned for the avocational radio control of model aircraft.

As it stands, the proposal would add commercial-usage frequencies in a manner which would cause control impairment of models in flight and during ground operations. This, in turn, would result in an intolerable hazard to individuals and property at or near established, locally-approved sites where radio-controlled models are flown.

(Please refer to the attached enclosure for facts regarding the nature of the models and their operation, along with a reference to a national aeromodelers' organization, the Academy of Model Aeronautics, of Reston, VA.)

As a beneficiary and frequent user of the present FCC frequency accommodation for aeromodeling, I assure you that the proposal will—if left unmodified—virtually eliminate a worthy and gratifying avocational activity; an activity enjoyed by a demographically diverse participant-group of enthusiasts who frequently invest a major portion of their available leisure time and financial resources to radio-controlled aeromodeling.

Please consider interceding on our behalf by urging the FCC to heed these concerns as they'll be articulated in a Formal Letter of Comment to be presented by the Academy of Model Aeronautics via their counsel. The identification of the proposal, once more, is PR Docket 92-235 and the deadline for Comment is 26 FEB 93.

In doing so, you'll be helping preserve one of the very few, very small segments of the public airwaves still available for non-commercial use by the American public.

Sincerely,

Charles W. Smith

c., encl: FCC
AMA

FACTS REGARDING RADIO-CONTROLLED MODEL AVIATION

20 JAN 93

1. The miniature aircraft affected by the FCC frequency proposal (PR Docket 92-235) should not be confused with radio-controlled toys commonly available at mass marketing outlets.
2. The average model weighs between 5 and 12 pounds, spans 5 to 7 feet and flies at speeds between 70 and 100 mph. Other, more specialized and elaborate models may reach speeds of up to 200 mph and may weigh as much as 55 pounds. Larger models exist, but are flown only when rigid pre-flight procedures have been met.
3. In addition to many non-representational "sport" designs, radio-controlled models replicate the complete range of full-scale aircraft, including multi-engine, commercial, aerobatic, vintage military and civilian types plus helicopters, jets and sailplanes. The majority of the models are built from kits, but many are designed and constructed "from scratch" by craftsman-operators.
4. A minimum outlay of about \$500 is necessary to "get a start" in the sport. Participants' investments average \$3,000-\$5,000, and individual commitments in excess of \$10,000 are commonplace.
5. Apart from the financial outlay required, the cultivation of considerable skill and discipline is necessary to ensure successful, safe operation of radio-controlled model aircraft.
6. Hundreds of user-maintained flying sites have been established on public and private lands. Clubs—usually numbering 50-300 members—are typically responsible for site management and operational safety. Safety is foremost among the concerns of users as well as site providers, many of which are park system administrations.
7. Estimates of participation are unreliable, but conservative numbers suggest that there are between 300,000 and 400,000 devotees to the sport.
8. Roughly 160,000 of the most active enthusiasts are members of the Academy of Model Aeronautics, a Reston, VA-based organization concerned with flying safety, competition conduct and guidance, liability underwriting, FCC liaison and other matters affecting the avocation and its participants.

SUMMARY:

If adopted, the FCC proposal (as outlined in PR Docket 92-235), would insert additional frequencies in a manner which ignores their activation's potential to interfere with the radio link between radio-controlled models and their operators' transmitters.

In addition to losses which would be sustained by the operators of affected models, it should be apparent that even "average" models can represent a significant hazard to any and all individuals and property at or near flying sites if their control integrity is compromised.

For these and other reasons, the structure of the proposal reveals a profound lack of technical acumen and/or concern for the public interest on the part of its originators, and the necessity to marshal and commit resources for opposition to such a proposal constitutes an unjustifiable imposition on present users of the subject frequency band.

C.S.

1-20-93

FCC
1919 M St. NW
WASHINGTON, DC
20554

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JAN 25 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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JAN 22 1993

FCC MAIL ROOM

RE: NPRM PR DOCKET 92-235

THE FOLLOWING IS IN REFERENCE TO
OPENING FREQUENCIES FOR COMMERCIAL
USE IN THE RADIO CONTROL SPORT INDUSTRY
RANGE.

THE DANGERS THAT THIS WOULD CAUSE IN THE
R/C AIRPLANE INDUSTRY AND R/C AIRPLANE
SPORT EVENTS OUT-WEIGH THE CHANGE.

MODEL R/C AIRPLANES ARE NOT WHAT THEY
WERE IN THE PAST. THESE MODELS HAVE FLYING
TIMES OF 15 MINUTES OR MORE AND
SPEEDS THAT REACH 200 M.P.H. SO DIVING
INTO A CROWD DUE TO FREQUENCY INTERFERENCE
COULD BE EXTREMELY DANGEROUS.

THE R/C INDUSTRY IS NO LONGER A
HOBBY AND TODAY SHOULD BE CONSIDERED
A SPORT...

THIS COMMERCIAL INSERT CAN NOT HAPPEN:

RESPECTFULLY

W. Tom 

RECEIVED

1365 West Grand Avenue
Chicago, IL 60622 Fax: (312) 829-9712
20 Jan 93

JAN 25 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RECF

JAN 22 1993

The Honorable Carol Braun
United States Senate
Washington, D.C. 20510

DOCKET FILE COPY ORIGINAL

FCC MAIL

Re: Federal Communications Commission PR Docket 92-235

Dear Senator Braun,

The abovementioned docket number refers to a radio frequency re-distribution proposal currently under consideration by the FCC. If adopted, the proposal would seriously compromise the viability of frequencies presently assigned for the avocational radio control of model aircraft.

As it stands, the proposal would add commercial-usage frequencies in a manner which would cause control impairment of models in flight and during ground operations. This, in turn, would result in an intolerable hazard to individuals and property at or near established, locally-approved sites where radio-controlled models are flown.

(Please refer to the attached enclosure for facts regarding the nature of the models and their operation, along with a reference to a national aeromodelers' organization, the Academy of Model Aeronautics, of Reston, VA.)

As a beneficiary and frequent user of the present FCC frequency accommodation for aeromodeling, I assure you that the proposal will—if left unmodified—virtually eliminate a worthy and gratifying avocational activity; an activity enjoyed by a demographically diverse participant-group of enthusiasts who frequently invest a major portion of their available leisure time and financial resources to radio-controlled aeromodeling.

Please consider interceding on our behalf by urging the FCC to heed these concerns as they'll be articulated in a Formal Letter of Comment to be presented by the Academy of Model Aeronautics via their counsel. The identification of the proposal, once more, is PR Docket 92-235 and the deadline for Comment is 26 FEB 93.

In doing so, you'll be helping preserve one of the very few, very small segments of the public airwaves still available for non-commercial use by the American public.

Sincerely,

Charles W. Smith

c., encl: FCC
AMA

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20 JAN 93

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SUMMARY:

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For these and other reasons, the structure of the proposal reveals a profound lack of technical acumen and/or concern for the public interest on the part of its originators, and the necessity to marshal and commit resources for opposition to such a proposal constitutes an unjustifiable imposition on present users of the subject frequency band.

C.S.

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JAN 25 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

1365 West Grand Avenue
Chicago, IL 60622 Fax: (312) 829-9712
20 Jan 93

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The Honorable Paul Simon
United States Senate
Washington, D.C. 20510

JAN 22 1993

FCC MAIL ROOM

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JAN 25 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

5330 Pickens Road SW
Powder Springs, GA 30073
January 20, 1993

JAN 22 1993

FCC MAIL ROOM

The FCC
1919 M Street NW
Washington, DC 20554

Dear Sirs;

I am writing to you to change the frequency spectrum that was chosen in (NPRM PR Docket 92-235), Specifically, the changes to Part 95. Inserting two new frequencies between those presently assigned for Radio Controlled Model use and Commercial use. To allow a "mobile" user only 2.5 kHz away from our present Model Radio Control equipment would immediately cause a hazardous safety problem with our six to twelve pound airplane models going out of control and make our present equipment obsolete overnight. Replacing hundreds of thousands of radio units across the United States would be very expensive, both collectively and individually. We have just completed a complete change in the last couple of years of our present units, narrow banding the sets to work safely within 10 MHz of an adjacent frequency. This rule as it stands would "shoot down" all our ½ watt units when in the same area as these mobile units putting out an overpowering 4 watts, just 2.5 kHz apart!

This proposed change in the present rules (The 455 page document addresses frequency use in another service, Part 88 of the Code of Federal Regulations), it will also effect Part 95, where our model aircraft frequencies are regulated. This restructuring will insert TWO new frequencies between those presently assigned for modeling and commercial users. This means we could have a "mobile" user, much higher in power, transmitting only 2.5 kHz away from many of our 72 MHz and 75 MHz frequencies, with catastrophic consequences!

The economic impact of over one hundred and twenty thousand modelers having to discard perfectly good Radio Control Units, because of a hastily contrived plan to placate a multi-million dollar communications industry. There are other areas of the radio frequency spectrum that would not be so seriously safety affected.

Please change this terrible rule proposal so "The Little Guy" and the Radio Controlled Model Industry can survive among the giants and their billions of loose dollars!

Sincerely,

Stephen W. Kovach