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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

JAN 27 1993

4209 S UNION  
INDEPENDENCE MO 64055  
JANUARY 21, 1993

FCC MAIL ROOM

92-235

FCC  
1919 M ST NW  
WASHINGTON D C 20003

GENTLEMEN:

I AM RETIRED AND DERIVE MANY HOURS OF ENJOYMENT FROM CONSTRUCTING AND OPERATING RADIO CONTROLLED MODEL AIRPLANES. I AM VERY CONCERNED ABOUT PROPOSED RULES THAT ARE CURRENTLY UNDER CONSIDERATION BY THE FEDERAL COMMUNICATIONS COMMISSION (FCC). THE PROCEEDING IS PR DOCKET 92-235. IF ADOPTED, THE NEW RULES WILL GREATLY REDUCE THE USABILITY OF FREQUENCIES CURRENTLY ASSIGNED FOR MODEL USE AND INCREASE THE RISK OF ACCIDENTS AND ATTENDANT LIABILITY FOR CONTROLLING MODEL AIRPLANES.

OUR RADIO CONTROL FREQUENCIES ARE IN THE 72 - 76 MHZ BAND. THIS BAND IS PRIMARILY USED FOR PRIVATE LAND MOBILE DISPATCH OPERATIONS. HOWEVER, OUR RADIO CONTROL FREQUENCIES IN THIS BAND ARE FAR ENOUGH APART FROM THE LAND MOBILE FREQUENCIES THAT WE HAVE BEEN ABLE TO SHARE THE BAND WITHOUT EITHER USE INTERFERING WITH THE OTHER.

NOW THE FCC WANTS TO CREATE MORE LAND MOBILE FREQUENCIES BY SPLITTING THEM INTO NARROWER BANDWIDTHS AND REARRANGING THE BAND PLAN. AS A RESULT, MAY LAND MOBILE FREQUENCIES WILL MOVE CLOSER TO THE RADIO CONTROL FREQUENCIES AND CAUSE INTERFERENCE TO RADIO CONTROL OPERATIONS. I AM TOLD THAT OF THE 50 FREQUENCIES THAT ARE PRESENTLY AVAILABLE FOR RADIO CONTROL OF MODEL AIRPLANES, ONLY 19 FREQUENCIES WILL BE LEFT IF THESE NEW RULES ARE ADOPTED.

WHEN WE FLY OUR MODEL AIRPLANES UNDER RADIO CONTROL, WE GO TO GREAT LENGTHS TO ASSURE THE SAFETY OF THE OPERATORS AND BYSTANDERS AND THE PROTECTION OF PROPERTY. MANY OF OUR SAFETY PRECAUTIONS INVOLVE THE CAREFUL COORDINATION AND USE OF THE RADIO CONTROL FREQUENCIES. IF THE NUMBER OF USABLE FREQUENCIES IS DIMINISHED AS PROPOSED BY THE FCC, THE REMAINING FREQUENCIES WILL BECOME CONGESTED AND THE MARGIN; OF SAFETY WILL BE GREATLY DECREASED.

PLEASE UNDERSTAND THAT MANY MODEL AIRPLANES HAVE WING SPANS UP TO 10 FEET AND WEIGH AS MUCH AS 30 OR 40 POUNDS. THE MODELS THEMSELVES ARE EXPENSIVE TO BUILD; BUT MORE TO THE POINT, THEY ARE CAPABLE OF CAUSING PROPERTY DAMAGE, SERIOUS INJURY, OR EVEN DEATH IF RADIO INTERFERENCE CAUSES THE OPERATOR TO LOSE CONTROL OF THE CRAFT. WE OFTEN FLY OUR MODELS AT ORGANIZED EVENTS AND CONTESTS WHERE HUNDREDS OF OPERATORS PARTICIPATE. WE NEED THE USE OF OUR FULL COMPLEMENT OF RADIO FREQUENCIES IN ORDER TO ASSURE A SAFE FLYING ENVIRONMENT.

I DO NOT THINK IT IS WISE OF THE FCC TO SEEK TO IMPROVE THE OPERATING CONDITIONS OF LAND MOBILE RADIO USERS AT THE EXPENSE OF RADIO CONTROL MODELERS. THE FCC MAY NOT THINK WE ARE AS IMPORTANT AS BUSINESS USERS OF RADIOS, BUT WE HAVE A CONSIDERABLE INVESTMENT IN OUR MODELS AND IN OUR RADIO EQUIPMENT. THE HOBBY PROVIDES MANY HOURS OF ENJOYMENT TO THOUSANDS OF PEOPLE LIKE MYSELF AND CONTRIBUTES TO THE ADVANCEMENT AND DEVELOPMENT OF THE COMMERCIAL AVIATION INDUSTRY.

PLEASE HELP ME CONTINUE THE SAFE ENJOYMENT OF MY PASTIME BY NOT ALLOWING THE FCC TO CARRY OUT ITS PROPOSALS FOR THE 72-76 MHZ BAND.

SINCERELY,

*John A. Cravino*

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