

LAW OFFICES OF
CYRUS D. HOGUE, III
110 WEST MARGARET LANE
HILLSBOROUGH, NORTH CAROLINA 27278

RECEIVED

FEB 0 1 1993

FCC MAIL ROOM

Area Code 919
Hillsborough Telephone 732-4865
Durham Telephone 682-3004
Facsimile 732-1522

Cyrus D. Hogue, III
Rebecca S. Mills
Thomas Wm. Whisnant

January 27, 1993

RECEIVED

FEB - 1 1993

Federal Communications Commission
1919 M. Street NW
Washington D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Sir or Madam:

I derive many hours of enjoyment from operating radio controlled model airplanes, competing in local and national events, studying airplane aerodynamics, and designing and building my own models.

I am very concerned about proposed rule that are currently under consideration by The US 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 bandwidth and rearranging the band plan. As a result many land mobile frequencies will move closer to the radio control frequencies and cause interference to radio control operations. 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 out 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.

No. of Copies rec'd 8
List: A B C D E

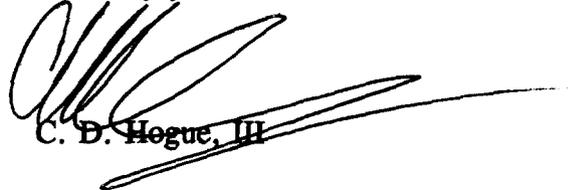
Please understand that many model airplanes have wing spans up to 10 feet and weigh as much as 30 or 40 pounds. The models themselves are expensive and very time consuming to build; but more to the point, even the smallest models that weigh less than a pound are capable of causing property damage, serious injury, and 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 with hundreds of spectators. We need the use of our full complement of radio frequencies in order to assure a safe flying environment.

I think it is dangerous and unwise for the FCC to seek to extend the operating abilities 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.

With personal regards, I am,

Sincerely yours,



C. D. Hogue, III



RECEIVED

FEB - 1 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY
January 24, 1993

RECEIVED

FEB 0 1 1993

FCC MAIL ROOM

FCC
1919 M Street NW
Washington, DC 20554

I would like to comment on your recent FCC Notice of Proposed Rule Making PR Docket 92-235. This NPRM, if approved, would cause a very hazardous condition. I understand that the FCC proposes a massive frequency restructuring in order to provide more frequencies for mobile land use. I am an active flyer of radio controlled model aircraft and the secretary of the Midnight Sun R/C club, Inc. in Fairbanks Alaska. Although the above NPRM addresses frequency use in another service (Part 88 of the Code of Federal Regulations) it will also effect part 95 which is where Radio Controlled model aircraft frequencies are regulated. The FCC would like to insert two new frequencies between those presently assigned for modeling use and those assigned for commercial use. This would result in having only 2.5 khz spacing between our model frequencies and those new frequencies designated for land mobile use. This would create a very hazardous situation! These new land use frequencies would be much higher in power than ours and because they are so closely spaced with ours there would be no way to prevent random interference. Although some view radio controlled aircraft as toys, I can assure you that they are not! Even a small model weighing 5 pounds and traveling at 60 miles per hour can easily cause a death or serious injury. There are hundreds of thousands of radio controlled aircraft flyers in the United States which means a great potential for fly away aircraft causing great damage to person or property. This NPRM could cost lives! Many of these aircraft are flown in the presence of large crowds where precise control over the model is a must. Having someone in a vehicle pick up their cellular phone and causing the loss of control of an aircraft is not acceptable. There is simply no way to operate safely at a 2.5 khz spacing between frequencies.

The model aircraft industry and users like myself recently spent a great deal of money to convert our radios to a new "narrow band" standard in order to gain more channels for use. The new frequencies proposed under NPRM - PR Docket 92-235 would render over half of our channels unusable due to interference. This is not fair to the radio control community and would cost millions of dollars in the purchase of new equipment.

I would like to sum this all up by saying that the laws of physics will not allow our radios to operate properly with higher power equipment only 2.5 khz away, the spacing is too close. Even equipment that was shipped new on the exact frequency could easily drift enough in normal use to interfere with the frequency adjacent to it which could be mine!

No. of Copies rec'd 0
LS:ABODE

Because model aircraft radios operate on much less than one watt of power, my aircraft could be knocked out of the sky by a land mobile radio several miles away.

This is a very serious problem and I am requesting you withdraw this NPRM and reconsider the proposed frequency assignments.

I can be reached at the club address or at my home address below.

Thank you for your consideration.

Daniel W Brekke

Daniel W Brekke
Secretary, Midnight Sun R/C club, Inc.
5127 Palo Verde Ave
Fairbanks AK 99709-3130

RECEIVED

FEB 01 1993

FCC MAIL ROOM

JANUARY 27, 1993

RECEIVED

FEB - 1 1993

FEDERAL COMMUNICATION COMMISSION
1919 M STREET, NW
WASHINGTON, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

I AM IN THE HOBBY BUSINESS AND EMPLOY 11 PEOPLE. MY BUSINESS WOULD BE DEVESTATED IF THE PROPOSED RULES THAT ARE CURRENTLY UNDER CONSIDERATION BY THE FEDERAL COMMUNICATION COMMISSION (FCC) PR DOCKET 92-235 IS PASSED.

YOUR NOTICE OF PROPOSED RULE MAKING (NPRM) IN PR DOCKET 92-235 PART 90 OF YOUR RULES WITH A NEW PART 88. PART 90 ALLOWS FOR SAFE USE OF R/C AIRCRAFT AND SERFACE MODELS BY KEEPING 10KHZ SPACING BETWEEN FIXED COMMERCIAL USERS AND FREQUINCES USED BY R/C ENTHUSIASTS. THE NEW PART 88 WILL ALLOW MOBILE USERS ON FREQUENCIES WITHIN 2.5 KHZ OF FREQUENCIES AVAILABLE TO US, ELIMINATING SAFE USE OF AT LEAST 31 OF THE 50 CHANNELS ON 72 MHZ BAND AND 10 OF 30 OF THE FREQUENCIES ON 75 MHZ BAND NOW USED BY HOBBYIESTS.

IF ADOPTED THE NEW RULES WILL GREATLY REDUCE THE USABILITY OF FREQUENCIES CURRENTLY ASSIGNED FOR MODEL USE AND INCREASE THE RISK OF ACCIDENT AND ATTENDENT LIABILITY FOR CONTROLLING MODEL AIRPLANES. WHEN WE FLY OUR MODEL AIRPLANES UNDER RADIO CONTROL WE GO TO GREAT LENGTHS TO ASSURE SAFETY OF THE OPERATORS BY-STANDERS AND PROPERTY. MANY OF OUR SAFETY PRECAUTIONS INVOLVE THE CAREFUL COORDINATION AND USE OF THE RADIO CONTROL FREQUENCIES. IF THE NUMBER OF USEABLE FREQUENCIES IS DIMINISHED AS PROPOSED BY THE FCC, THE REMAINING FREQUENCIES WILL BE CONGESTED AND THE MARGIN FOR SAFETY WILL BE GREATLY DECREASED.

MANY AIRPLANES HAVE WING SPANS UP TO 10 FT AND WEIGH AS MUCH AS 30 OR 40 POUNDS. THE MODELS THEMSELVES ARE EXPENSIVE, BUT MORE TO THE POINT, THEY ARE CAPEABLE OF CAUSEING PROPERTY DAMAGE, SERIOUS INJURY OR EVEN DEATH IF THE 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. THE SAFETY FACTOR WILL BE OF GREAT CONCERN TO THE 8 LOCAL FLYING FIELDS, ALL OF WHICH ARE LOCATED IN COUNTY PARKS, OPENING UP THE POSSIBILITY OF MANY INJURY RELATED LAW SUITS.

I DO NOT THINK IT IS WISE OF THE FCC TO SEEK TO EXPAND THE OPERATION CONDITIONS OF LAND MOBILE RADIO USERS AT THE EXPENSE OF THE RADIO-CONTROL MODELERS. THE FCC MAY NOT THINK WE ARE AS IMPORTANT AS BUSINESS USERS OF RADIO, BUT WE HAVE A CONSIDERABLE INVESTMENT IN OUR MODELS AND IN OUR RADIO EQUIPMENT. IT IS A BILLION DOLLAR INDUSTRY THAT MUST BE SAVED FROM THE DETRIMENTAL FCC ACTIONS. THE HOBBY PROVIDES MANY HOURS OF ENJOYMENT TO HUNDREDS OF THOUSANDS OF PEOPLE AND CONTRIBUTES TO THE ADVANCMET AND DEVELOPMENT OF THE COMMERCIAL AVIATION INDUSTRY.

No. of Copies rec'd 0
List A B C D E

PLEASE HELP ME CONTINUE MY BUSINESS WITHOUT INTERFERENCE BY RECONSIDERING THIS ACTION. KEEP 10KHZ SPACING BETWEEN ALL FREQUENCIES ON 75 MHZ AND 72 MHZ FREQUENCIES AVAILABLE FOR SAFE USE BY R/C ENTHUSISTS. PLEASE DONT ELIMINATE THIS HOBBY THAT HAS GROWN TREMENDOUSLY OVER THE PAST 30 YEARS AND HAS SO MUCH INVESTMENT OF MONEY AND ENJOYMENT OF PEOPLE NATIONWIDE.

SINCERELY,

KENNETH FORD,
WILLIS HOBBIES
285 WILLIS AVE.
MINEOLA, N.Y. 11501
516-746-3944

Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

RECEIVED

FEB - 1 1993 RECEIVED

Sir:

I am writing to you concerning Federal Communications Commission Proposed Rule Making PR Docket 92-235. This rule has a section concerning Part 95 of the Code of Federal Regulations which is of serious interest to me for several reasons - one of them being safety.

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY
FEB 01 1993
FCC MAIL ROOM

I fly radio-controlled model aircraft. NPRM PR 92-235 proposes the placing of multiple commercial-use frequencies between those allocated by the FCC for R/C use. These new frequencies can be used on mobile equipment and as such present an extreme danger. Normally there is little risk involved in this hobby and accidents are few, but the interference possibilities introduced by this bill will change that. If this ruling is enacted, a pilot may lose control of a plane any time one of the new transmitters began broadcasting within range of the pilot. The planes we fly are relatively large and fly at significant speeds. Loss of control could result in serious injury for a person struck by a "runaway" plane.

The technology required to upgrade our radios to where they could reject the more powerful signals on the new frequencies is not available. Estimates on cost if it became available are many times the present cost of our radios and will kill the hobby - a hobby that introduces many (including children) to technology, aerospace, and engineering professions.

Many American businesses manufacture or distribute items for R/C use (kits, radios, engines, accessories, etc.). This will all end if NPRM PR 92-235 is enacted.

I respectfully ask that you protect our frequencies, preserve our present levels of safety, and keep this action from killing the hobby, by not enacting NPRM PR 92-235.

Very truly yours,

Richard O'Reilly

No. of Copies rec'd 0
SEARCHED _____
SERIALIZED _____

RECEIVED

FEB - 1 1993

RECEIVED

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

FEB 0 1 1993

1-25-93

Dear Sir,

FCC MAIL ROOM

May I have help in a matter that could effect not only myself, but thousands others.

I belong to a club of over 100 members who build and fly radio controlled aircraft. There are many clubs out there like ours with many members with the same goals.

We are aware of and adhere to the safety regulations precisely to the best of our abilities.

Recently I was informed of a proposed change of rules by the FCC. The PR Docket 92-235. If adopted the new rules will have a serious effect on the frequencies assigned to modeling use by reducing the currently usable frequencies and increasing the risk of accidents and safety of the people attending the events.

Our frequencies are in the 72-76 MHz band. This band is used for private mobile land dispatch operations. However, our radio control frequencies 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.

No. of Copies rec'd _____
LEA/RODE

0

(over)

FEB 1 - 1982

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Now the FCC wants to create more land mobile frequencies by splitting them into narrower bandwidths and re-arranging the band plan. As a result many land mobile frequencies will move closer to the radio control frequencies, control frequencies and cause interference to radio controlled operations. I also understand this will reduce the currently 50 frequencies to a mere 19. If the new rules are adopted.

We as clubs often fly in organized events or competitions where many people attend and wish to assure the safety of everyone and our aircraft. We have outstanding safety records, but out of control the aircraft can be very dangerous if radio interference causes loss of control.

Please help us continue the safe enjoyment of our pastimes by not allowing the FCC to carry out its proposals for the 72-76 MHz band. Thank you

Sincerely

AMA member #369695

Marcello DiPerna

Southern New Hampshire Radio control Club.

RECEIVED

January 25, 1993

RECEIVED

FEB 01 1993

FEB - 1 1993

Dear FCC,

FCC MAIL ROOM

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

I've received information regarding the adoption of PR. Docket 92-235. It must not be allowed to pass.

I'm a 35 year modeler of radio control aircraft and I'm very proud of my hobby. You cannot let ground mobile operators share close frequencies. This will be disastrous.

I take extreme care in maintenance of my equipment, which I own \$30,000 of. I am an exhibition pilot and have flown in front of Airforce Base crowds and school shows.

Disruptive radio ~~interference~~ interference of this kind will cause a 100 mph projectile into a crowd of children, to say the least - dangerous!

This is a very "deadly" ruling that - you - are putting forth. It must not be allowed to pass.

Sincerely,

Billy Peana

No. of Copies rec'd 0
List A B C D E

RECEIVED

FEB - 1 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

January 22, 1993

RECEIVED

FEB 01 1993

FCC MAIL ROOM

Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Dear Sirs:

It has recently come to my attention that the Federal Communications Commission (FCC) is considering an action that will severely limit and potentially eliminate a very important hobby of mine, radio controlled (R/C) model airplanes, helicopters, cars and boats.

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 for safe use of R/C aircraft and surface models by keeping 10 Khz spacing between fixed commercial users and frequencies used by R/C enthusiasts. The new Part 88 will allow mobile users on frequencies within 2.5 Khz of frequencies available to us, eliminating safe use of at least 31 of the 50 channels on the 72 MHz band and 10 of the 30 frequencies on the 75 MHz band now used by hobbyists. In fact, more channels will likely be affected.

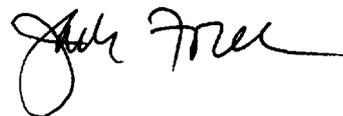
This action will have a severe, detrimental impact upon me and the entire R/C hobby industry. If put into effect, my airplane or helicopter could easily be shot out of the sky by a mobile user I'd have no way of knowing about. This creates a severe health hazard.

I have been involved in this hobby for 2 years. I own 6 radios and 9 model airplanes, helicopters, cars and boats. In addition, I have numerous engines, motors, chargers, field accessories and other products necessary to support my hobby. When you consider there are hundreds of thousands of other R/C hobbyists in the U.S. just like me, these proposed rule changes will affect a lot of people economically and in terms of enjoyment.

I urge you to reconsider this. Keep 10 Khz spacing between all frequencies on 75 MHz and 72 MHz bands available for safe use by R/C enthusiasts. Please don't eliminate this hobby that has grown tremendously over the past 30 years and has so much investment of money and enjoyment of people nationwide.

Thank you for your consideration.

Sincerely,



A.M.A.# 412151

No. of Copies rec'd 10
List A B C D E

Federal Communications Commission
1919 M Street NW
Washington, DC 20554

RECEIVED

FEB 0 1 1993

Urgent: Serious problem with PR Docket 92-235.

FCC MAIL ROOM

Dear Sirs:

Please help me! My hobby is the construction and operation of radio controlled model airplanes. I have been in this hobby for many years and have a considerable investment in it. It is a wonderful hobby for young and old. Also, I have many friends in this hobby.

I am very concerned about the 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 absolutely cause radio interference on the majority of frequencies currently assigned for RC model aircraft use. Safety is very important in this hobby.

Our RC frequencies are in the 72 - 76 MHz band. We share this band with the private land mobile dispatch operations. However, now the FCC wants to create more land mobile frequencies by splitting them into narrower bandwidths and rearranging this band. The mobile frequencies will be separated by 5 KHz but they will bracket the RC frequencies by only 2.5 KHz. This will cause interference on the RC channels. In addition **the technical specifications for the new mobile equipment allows a frequency tolerance which could place their signal directly on an RC channel.**

Can you imagine all the RC airplanes, each costing several hundred dollars or more, that will be crashing to the ground because someone uses a "mobile" telephone in the vicinity. We modelers have controls and rules in place to assure the safety of the operators and bystanders and also the protection of surrounding property. But there will be no protection against these new frequencies because they are "mobile" and we would never know where they are.

The frequency changes are proposed by the FCC Land Mobile Service. The FCC has issued a Notice of Proposed Rule Making (**NPRM - PR Docket 92-235**)

All over the country there are organized events and contests where hundreds of operators participate. Spectators often number in the thousands at these events. This hobby provides many hours of enjoyment to hundreds of thousands of people like myself and my family. *Please help keep model aviation safe.*

The FCC must not be allowed to carry out its proposals for the 72 - 76 MHz band.

Sincerely

Rudolph W. Bracht

No. of Copies rec'd _____
List A B C D E

D

January 19, 1993

RECEIVED

FEB 01 1993

FCC MAIL ROOM

RECEIVED

The FCC
1919 M Street NW
Washington, DC 20510

Dear Sirs;

At the last meeting of the Radio Control Model Airplane Club of which I am a member (North Alabama Radio Control Association (NARCA)) an announcement was made about the Federal Communications Commission considering a rules change that would reduce the availability of frequencies currently assigned for model use and also increase the risk of accidents while flying model aircraft

FEB - 1 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

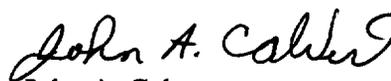
The FCC proceeding is PR Docket 92-235. This proceeding would create more land mobile frequencies and move the created frequencies closer to the radio control frequencies and thus cause interference to radio control frequencies. Of the 50 radio control frequencies presently available only 19 will be left if these new rules are adopted.

Our Radio Control Model Airplane flying club goes to great effort to insure the safety of all when flying our model aircraft. A lot of that effort is in the coordination of the use of radio control frequencies (no one can use a frequency that is being used by another flyer). I will leave it to your imagination to what would happen if two flyers were flying two aircraft at the same field on the same frequency. As a minimum it would mean the destruction of one of the aircraft. Radio interference from other sources could mean property damage as well as physical injury. Model aircraft can weigh as much as 25 pounds and travel up to 60 miles per hour. An object that large traveling that fast can inflict great damage to what it hits.

I personally derive great pleasure from building and flying model aircraft. I have been interested in flying for many years and have a considerable investment in time and money in my model aircraft. For the FCC to render over half of our frequencies unusable I think would be unwise. The hobby provides many hours of relaxation for many persons. If the FCC reduces the usable number of frequencies it would restrict the availability of usable radio control frequencies.

I would request your support in defeating PR Docket 92-235 (leave the modeling frequencies as they are now).

Respectfully,



John A. Calvert
178 Crystal Creek Dr.
New Market, AL 35761

No. of Copies rec'd 1
List A B C D E

RECEIVED

FEB - 1 1993

FEDERAL COMMUNICATIONS COMMISSION

OFFICE OF THE SECRETARY

RECEIVED

FEB 0 1 1993

FCC MAIL ROOM

January 21, 1993

Federal Communications Commission
1919 M St., NW
Washington D.C. 20554

Sir:

Please record my **opposition to F.C.C. Action - NPRM PR Docket 92-235.**

Portions of this docket propose adding commercial frequencies within the 72MHz range rendering current radio controlled aircraft transmitters and receivers useless. Most of this equipment is less than three years old as it was replaced or rebuilt to comply with current F.C.C. code.

Regards:

Denise Bower

Denise Bower

cc: The Honorable Donald Reigle
The Honorable Carl Levin
The Honorable James Barcia

No. of Copies rec'd _____
List: A B C D E

0

RECEIVED

January 18, 1993

FEB - 1 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RECEIVED

FEB 0 1 1993

FCC MAIL ROOM

Dear *F.C.C.*

I am writing you to request your help in a matter that would effect not only myself but thousands of others.

I build and fly radio controlled models, and belong to a local radio control club that has over 100 members, flying all sorts of aircraft. Ours is only one of many clubs this size or larger in New Hampshire. Some look at the building and flying of radio controlled models as merely playing with toys, but in reality it is so much more.

Radio controlled airplanes are a teaching tool that helps those involved understand material selection, structure, pride and accomplishment through sport flying or competition. Once our airships are complete we experience the laws of aerodynamics, sometimes with astounding results, and other times with disappointment, but we all adhere to strict safety guidelines. Each model, and flight teaches us something.

Many of the materials used on full sized aircraft, first were used in models to determine feasibility, and practicality. I know each time I board a private, or commercial plane it had its roots somewhere in a model. Many of the famous Radio Controlled models may be seen at the Smithsonian Institute.

Recently I was informed of a proposed change of rules currently under consideration by the Federal Communication Commission (FCC). The proceeding is **PR Docket 92-235**. If adopted, the new rules will have a profound negative effect on the frequencies currently assigned for modeling use by reducing currently usable frequencies, and increasing the risk of accidents and attendant liability for controlling model aircraft.

Our radio control frequencies are in the 72-76 MHz band. This band is used for private mobile land dispatch operations. However, our radio control frequencies 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, many land mobile frequencies will move closer to the radio control frequencies and cause interference to radio controlled

No. of Copies rec'd _____
List A B C D E

0

RECEIVED

FEB 1 - 1982

NOISE AND VIBRATION
OPERATIONS

operations. I also understand that this will reduce the currently usable 50 frequencies to a mere 19 frequencies if the new rules are adopted.

When we fly our radio controlled models we go to great lengths to assure the safety of the operators, as well as bystanders, and the protection of property. During a typical flying session the modelers very carefully coordinate the use of these frequencies, our safety depends on it, and if I might say so we are experts at it. If the usable number of frequencies are diminished as proposed by the FCC, the remaining frequencies will become congested and the margin for safety will be greatly reduced.

Please understand that many of the models to which I refer have wing spans up to 10 feet and weigh as much as 30 to 40 pounds. The models take from tens to thousands of hours to build not to mention the expense. Models like these have outstanding safety records, but out of control they are capable of causing great property damage, serious injury, or even death if radio interference causes loss of control to the operator. We as clubs or groups often fly in organized events or competitions where hundreds of operators may participate. We need the use of our full compliment of frequencies to assure the safety of others as well ourselves, and our aircraft.

I don't 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 made a considerable investment in our models and our radio equipment. The hobby provides thousands of modelers and myself many hours of enjoyment and contributes to the advancement 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,



RECEIVED

FEB 0 1 1993

Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

FCC MAIL ROOM
RECEIVED

Dear Sirs:

FEB - 1 1993

It has recently come to my attention that the Federal Communications Commission ~~FEDERAL COMMUNICATIONS COMMISSION~~ considering an action that will severely limit and potentially eliminate a very important hobby ~~OFFICE OF THE SECRETARY~~ radio controlled (R/C) model airplanes, helicopters, cars and boats.

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 for safe use of R/C aircraft and surface models by keeping 10 Khz spacing between fixed commercial users and frequencies used by R/C enthusiasts. The new Part 88 will allow mobile users on frequencies within 2.5 Khz of frequencies available to us, eliminating safe use of at least 31 of the 50 channels on the 72 MHz band and 10 of the 30 frequencies on the 75 MHz band now used by hobbyists. In fact, more channels will likely be affected.

This action will have a severe, detrimental impact upon me and the entire R/C hobby industry. If put into effect, my airplane or helicopter could easily be shot out of the sky by a mobile user I'd have no way of knowing about. This creates a severe health hazard.

I have been involved in this hobby for 56 years. I own 6 radios and 6 model airplanes, helicopters, cars and boats. In addition, I have numerous engines, motors, chargers, field accessories and other products necessary to support my hobby. When you consider there are hundreds of thousands of other R/C hobbyists in the U.S. just like me, these proposed rule changes will affect a lot of people economically and in terms of enjoyment.

I urge you to reconsider this. Keep 10 Khz spacing between all frequencies on 75 MHz and 72 MHz bands available for safe use by R/C enthusiasts. Please don't eliminate this hobby that has grown tremendously over the past 30 years and has so much investment of money and enjoyment of people nationwide.

Thank you for your consideration.

Sincerely,

Henry W. Spielman
A.M.A. #18600

No. of Copies rec'd 0
List A B C D E



BRIDGEWATER STATE COLLEGE
Bridgewater, Massachusetts 02325

RECEIVED

FEB 0 1 1993

FCC MAIL ROOM

January 25, 1993

Ms. Donna Searcy, Secretary
Federal Communications Commission
1919 M Street NW
Washington, DC 20554

RECEIVED

FEB - 1 1993

Dear Ms. Searcy:

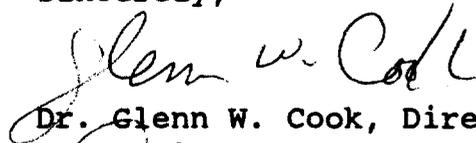
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RE: MM Docket 92-266 (on preferential leased access channel rates for not-for-profit programmers), we would urge the FCC to support such preferential rates.

Commercial networks lack the grassroots commitment that locally based programmers have toward their constituents. Moreover, the fact that their programming content is profit-driven and ratings-based often precludes their willingness to take on controversial or localized issues with anything but watered-down content.

Without FCC establishment of preferential rates, it would be difficult if not impossible for most non-profit programmers to gain access to leased access channels. This would be a most unfortunate departure from the spirit of the Congressional mandate to make available such channels to insure diversity of public information sources.

Sincerely,


Dr. Glenn W. Cook, Director


Richard Gopen, Staff Assistant
Bridgewater State College Media Service

No. of Copies rec'd _____
List ABCDE

0

RECEIVED

FEB - 1 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RECEIVED

FEB 0 1 1993

FCC MAIL ROOM

January 28, 1993

Federal Communications Commission
1919 M Street, NW
Washington, DC 20554

Dear Sirs:

It's recently come to my attention the FCC is considering an action that will severely limit and potentially eliminate a very important hobby of mine, radio controlled RC model airplane flying.

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 for safe use of R/C aircraft and surface models by keeping 10 Khz spacing between fixed commercial users and frequencies used by R/C modelers. The new Part 88 will allow mobile users on frequencies within 2.5 Khz of frequencies available to us. This eliminates safe use of at least 31 of the 50 channels on the 72 MHz band and 10 of the 30 freqs of the 75 MHz we now use. In fact, more channels will likely be affected.

This action will have a severe, detrimental impact on me and the entire R/C industry. If put into effect, my airplane could easily be shot out of the sky by a mobile user I'd have no way of knowing about. This loss of control could be extremely dangerous to others, as well as costly to me.

I've been involved in model aviation for 10 years. I have literally thousands of dollars tied up in radio equipment and airplanes. When you consider there are hundreds of thousands of other R/C hobbyists in the US just like me, these proposed rule changes will affect a lot of people economically and recreationally.

I strongly urge you to reconsider this. Keep 10 Khz spacing between all freqs on 75 MHz and 72 MHz bands available for safe use by R/C pilots. Don't eliminate this hobby that has grown tremendously over the last 30 years. And cause the waste of so much investment in equipment and loss of enjoyment of people nationwide.

Thank you for your consideration.

Sincerely,



Gary L. Smith

No. of Copies rec'd _____
List A B C D E

8

RECEIVED

FILE COPY ORIGINAL

January 24, 1993

FEB - 1 1993

TAYLOR and PATRICIA VAUGHAN

7644 Lazy Hollow Cove Memphis, TN 38125 (901) 753-7410

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Federal Communications Commission
1919 M St. NW
Washington, DC 20554

RECEIVED

FEB 0 1 1993

FCC MAIL ROOM

RE: PR Docket 92-235

Dear Sirs;

I am concerned about the subject proposed rule which will have an adverse impact on radio frequencies reserved for use with radio controlled model aircraft, cars and boats.

Existing rules (part 90) provides for safe spacing (10 Khz) between fixed commercial users and frequencies used by R/C models. The new rules (part 88) will allow mobile communication devices to operate with only 2.5 Khz spacing, which will eliminate safe use of at least 31 of the 50 channels on the 72 MHz band and 10 of the 30 frequencies on the 75 MHz band.

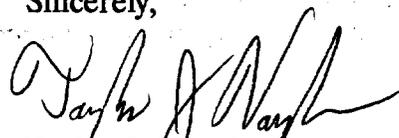
Having just purchased my own radio equipment, this rule change has a direct financial impact on me. I'll have to throw away hundreds of dollars of equipment less than a year old. Of even greater concern is those who won't stop using their equipment, and will continue to fly aircraft under unsafe conditions. A spurious radio signal could cause a model aircraft to cause property damage or even bodily injury.

I recognize that the mobile communications industry is growing rapidly and is providing great benefit to our society. However, since that industry needs the channels, it should develop the technology to effectively provide the needed channels in the frequencies currently available to it. It should not take channels away from another industry.

At the very least, lets extend the effective date of this rule change. Once a rule has been passed, and well publicized, do not make it effective until 5 years hence. This is a proper depreciation period for durable equipment. Existing users of R/C equipment will get a minimum of 5 years use from equipment purchased, and new comers will be advised not to purchase radios in certain channel ranges.

I urge you to reconsider this rule change. Thank you for your consideration.

Sincerely,


Taylor J. Vaughan

No. of Copies rec'd _____
List A B C D E

0

RECEIVED

FEB - 1 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RECEIVED

FEB 0 1 1993

FCC MAIL ROOM

Federal Communications Commission
1919 M St. NW
Washington DC 20544

Dear Sir or Madam,

I am very concerned about the proposed rules that are currently under consideration by the Federal Communications Commission. The proceeding is PR Docket 92-235. If adopted, the new rules will greatly reduce the usability of frequencies already 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, a band 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, many Land Mobile frequencies will move closer to the radio control frequencies. 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. Many thousands of dollars of radio control equipment owned by members of my club will be rendered useless.

When we fly our model airplanes we go through great lengths to assure the safety of the operators and bystanders and the protection of property. Our safety precautions involve the careful coordination and use of the assigned 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 reduced. Please understand that many model airplanes have wing spans up to 10 feet, weigh as much as 30-40 pounds and fly at a high rate of speed. 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 need the use of our full compliment of radio frequencies in order to assure a safe flying environment.

I do not think it is wise for the FCC to seek to allocate more radio frequencies for Land Mobile 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 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 to continue the safe enjoyment of my pastime by not implementing NRPM PR Docket 92-235.

Sincerely,

Arvid Fellberg
Action Hobbies of Burke

No. of Copies rec'd 0
LIST ABCDE

Richard G. West
RD3 Box 489E
Felton, DE 19943

1/29/93

RECEIVED

RECEIVED

FEB 01 1993

FEB - 1 1993

Federal Communications Commission
1919 M Street NW
Washington, DC 20554

FCC MAIL ROOM

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Dear Sir,

I am a father of two who has enjoyed building and flying model airplanes since I was a child. My children are now old enough to begin enjoying the hobby and I have incorporated models into Boy Scout activities.

I am strongly opposed to PR Docket 92-235 regarding the 72 - 76 MHz band.

The proposed changes in PR Docket 92-235 would effectively eliminate the use of all but 19 of the 50 frequencies now available for model airplanes. This is because the Land Mobil Service transmitters have four times the power of ours, are mobile so we can not avoid them, and the legal frequency tolerances could actually put their signal on top of ours.

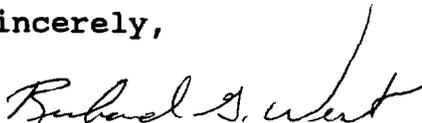
Model hobbyist like myself have hundreds of dollars invested in the models and equipment we use. The changes would result in replacing much of this equipment. No one that I know will want to risk losing a plane that costs hundreds of dollars and has taken months to build.

Safety is a primary concern. Many of the models have wing spans of up to 10 feet, weigh as much as 40 pounds, and travel at speeds in the 100 mph range. Losing control of even smaller models could result in great property damage, injury to spectators, or even death! The proposed changes in the frequencies would greatly increase the risk of loss of control of a plane, especially at competitive meets where hundreds of operators participate. Currently safety is maintained by frequent education and strict frequency control.

Just as I enjoyed model airplanes as a child, it is vital to the future of our children and this country that we provide good, clean, and even educational forms of recreation. Supporting model airplane construction and flying is one of the things that we can do to help keep kids away from drugs and gangs. **Please help by not changing the 72 - 76 MHz band.**

Thank you.

Sincerely,



Richard G. West

No. of Copies rec'd 0
List: ABCDE

RECEIVED

FEB - 1 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

January 25, 1993

RECEIVED

FEB 0 1 1993

FCC MAIL ROOM

P.M. McGuigan, M.D.
4102 Carriage Hills Drive
Rapid City, SD 57702
(605) 348-6676

FCC
1919 M Street, NW
Washington, DC

Re: PR Docket 92-235

Dear Sirs:

The purpose of this letter is to register my opposition to this proposed rule making in the strongest possible terms. The reason for my opposition is the marked damage it will do to the sport of radio-controlled aeromodeling here in the United States. Even worse, the proposed rule changes represent a distinct danger to life and limb since the changes will almost guarantee radio interference with its resulting loss of control of model aircraft.

The sport of radio-controlled aeromodeling has several hundred thousand participants here in the United States and probably millions on a world-wide basis. In addition to its value as a sport, radio-controlled aeromodeling has several commercial and industrial applications such as aerial photography, carrying pilot lines across canyons, radio-controlled crop spraying, etc. All of these applications depend on a reliable radio link between the transmitter and the receiver to allow for their safe and successful consummation.

Beginning in the early 1980's, the Academy of Model Aeronautics, the FCC and representatives of the manufacturing industry formulated plans for expanding the number of frequencies available for radio-controlled modeling uses in this country. A total of 50 frequencies in the 72 MHz band were allocated for aircraft use and 30 frequencies were allocated for use by surface vehicles in the 75 MHz band. A phase-in plan extending over a period of ten years was adopted to allow the industry to create and improve the technology for the narrower bands which would be necessary for this increased number of channels. All modelers had to modify older transmitters to broadcast narrower bands. New receivers had to be developed and purchased by us modelers since older receivers could not be modified to discriminate in the narrower bandwidths that were necessary. This exhaustive process culminated with the release of the final group of the new frequencies for use in January of 1991. Modelers have undergone an extensive and expensive process of adaptation and upgrading to operate in this new environment. Now that we have barely had time to begin to function in this environment, this Notice of Proposed Rule Making

No. of Copies rec'd 0
List A B C D E

threatens to remove access to most of it from us. Not only is this not fair! It is downright dangerous!

International competitive events are held in all classes of radio-controlled aeromodeling which involves the selection of teams to represent the United States. These teams must be able to train and practice in order to represent our nation effectively in international competition. In addition, there are a large number of competitive events held in this country during which radio-controlled aircraft are operated before crowds of spectators numbering into the hundreds of thousands. In addition to their contribution to aviation, these events make very significant economic impact on the communities in which they are held. This exposure has been magnified during the past ten years by the growth of sanctioned air show teams under the auspices of the Academy of Model Aeronautics to demonstrate to the general public the subject of aviation itself and the sport of radio-controlled model aviation in an informative and enjoyable way. Much of the growth of this show team movement can be attributed to the increased number of channels available to us and the improvements in radio control systems that have occurred during that period. I am the manager of The Gold Squadron Air Show Team (Sanctioned Team #147) and I can assure you that safety is always uppermost in our mind as we plan and conduct our air shows.

Many of the aircraft we operate have wingspans in excess of ten feet, travel at actual speeds in excess of 150 mph, and can weigh over 50 pounds. The safety I mentioned above depends entirely on a clean and reliable radio link between the transmitter and the receiver. An aircraft of the dimensions mentioned above can easily cause extensive property damage, serious injury, or death if control is lost and it impacts in a crowd of spectators, strikes a parked Air Force Thunderbird at an air show, or hits a passing gasoline tanker.

Our frequencies in the 72 MHz and the 75 MHz bands are now 20 kHz apart. Evenly interspersed between them are frequencies used by low-power commercial operators (each 10 kHz from one of ours). Our narrow-banded equipment was designed and manufactured to operate in this environment and, to this point, it has done that very well. To the best of my knowledge, there has been little in the way of significant interference impeding the use of our frequencies since all of them became available two years ago.

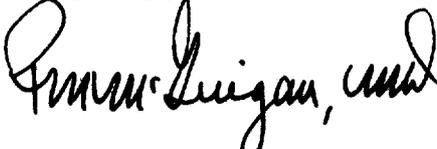
Your proposal would allow the introduction of as many as four new users between each of our frequencies, at least in the lower portion of our band. These new frequencies would be as close as 2.5 kHz to our current frequencies. Those users would be allowed power outputs several times higher than ours. In addition, they would be mobile and could show up unpredictably at or around our flying sites with disastrous results. I am told that this proposal directly threatens 31 of our currently available 50 frequencies.

Whatever the merits of the petitioners for these changes may be, they can not be of sufficient importance to risk the chance of injury or death that would result from its

implementation. The proposal must be withdrawn or modified so that the proposed changes do not introduce users in our bands. There is no doubt in my mind that there are other locations throughout the spectrum of radio frequencies where these petitioner's interests can be addressed without the potential for disaster that the current proposal has. It is one thing to have to endure the inconvenience of some "static" or "snow" due to interference. It is quite another thing to have somebody killed or maimed by interference.

In conclusion, I ask that you modify this proposal so that our frequencies remain clean and usable for the purposes for which they were awarded - the safe and enjoyable pursuit of the sport of radio-controlled aeromodeling.

Very truly yours,

A handwritten signature in black ink, appearing to read "P.M. McGuigan, M.D.", written in a cursive style.

P.M. McGuigan, M.D.

cc: Academy of Model Aeronautics