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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Date: January 23, 1993

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To the FCC,

FCC MAIL ROOM

First let me start by thanking you for taking the time to read this letter. I know you are very busy so I will keep this as short as possible and to the point.

My name is David B. Plummer. I live in Shelby County Illinois. I have for many years received many hours of enjoyment from the hobby of building and flying model airplanes. I am currently the president of the local club. We have worked with the local schools, and the cub scouts with programs that promote model aviation. We feel this is an excellent way of getting our youth involved in something other than drugs and street crime. I personally have two young boys that enjoy learning to work with their hands. Building something from a pile of wood and then flying it gives a great feeling of accomplishment. This has led to many great careers in aviation. Now that I have introduced myself and given you a little background let me get to the main reason for this letter.

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 the 72 - 76 MHz band. This band is primarily used for private land Mobil dispatch operations. However, our radio control frequencies in this band are far enough apart from the land Mobil 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 Mobil frequencies by splitting them into narrower bandwidths and rearranging the band plan. As a result, many land Mobil frequencies will move more closer to the 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 the 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 to 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.

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I do not think it is wise of the FCC to seek to improve conditions of the land Mobil 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,

David B. Sumner

30 Knox Avenue
Bangor, ME 04401
January 25, 1993

FEDERAL COMMUNICATIONS COMMISSION
1919 M Street NW
Washington, DC 20510

Gentlemen:

I am writing you as an individual and as president of a model aircraft club .. ie. Mid-Maine Giant Aircraft Modelers, Chapter No. 272, International Miniature Aircraft Assn.. I am retired and spend a good deal of my time constructing and operating radio controlled miniature aircraft. I am also active in two additional Maine model aircraft clubs whose members enjoy building and flying these model airplanes. I have thirteen of these large models, some over 30 pounds in weight, and twelve remote control radio systems. I've also a workshop full of tools and accessories necessary to build and operate my models.

I am very concerned about your proposed rule (PR DOCKET 92-235), which, if adopted, will greatly reduce the safety and use of radio frequencies currently assigned for our radio controlled model use. As I'm sure you are well aware, these frequencies are in the 72-76 MHz band used primarily for private land mobile dispatch operations. However, our frequencies in this band are far enough apart from the land mobile frequencies that we've been able to share their use without interfering with one another.

Your Notice of Proposed Rule Making (NPRM) in PR Docket 92-235 replaces Part 90 of the Rule with a new Part 88. As you're well aware, Part 90 allows for the safe use of R/C aircraft and surface models by keeping 10 Khz spacing between fixed commercial users and frequencies used by we R/C modelers. Your new Part 88, as I understand it, will allow mobile users on frequencies within 2.5 Khz of the frequencies available to us, eliminating (in my opinion) the safe use of at least 31 of the 50 channels on the 72 MHz band (R/C aircraft) and 10 of the 30 frequencies on the 75 MHz band (R/C cars and boats) now used by we hobbyists. IN FACT I believe even more channels will likely be affected.

We go to great lengths to operate our models safely and to protect our property and bystanders. This involves the careful coordination and use of the radio control frequencies. I have even purchased my own personal frequency analyzer for flying field evaluations of R/C radio frequency use. Safety is paramount!! If the number of these usable frequencies is diminished, as proposed by your Rule change, the remaining frequencies will become congested and the margine of safety greatly reduced.

We don't think it wise to seek to expand the operating conditions of land mobile radio users at the expense of we radio control modelers. We have a considerable investment in our model and radio equipment. I have personally spent over \$40,000 in the last seven years. The

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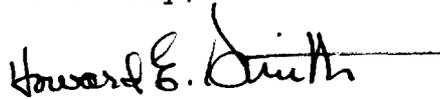
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hobby provides many hours of enjoyment to hundreds of thousands of people like us and contributes to the advancement and development of the aviation industry.

I understand the desire of the radio telecommunications industry to expand their operations. I'm a retired manager from a large telecommunications company and have a mobile telephone unit in my motor vehicle. However it seems to me that little people are continually being squeezed out of life's pleasures by the ambitious expansions of the powerful and influential.

Won't you please reexamine your proposal and help us to continue the safe enjoyment of our pastime?

Sincerely,

A handwritten signature in black ink that reads "Howard E. Smith". The signature is written in a cursive style with a horizontal line extending from the end of the name.

Howard E. Smith, Pres.
Mid-Maine Giant Aircraft Modelers