Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554 - USA

In the Matter of	)	
	)	**PR Docket No. 92-289**
Amendment of the Amateur Service	)	
Rules Concerning the 222-225 MHz	)	
and 1240-1300 MHz Frequency Bands	)	

TO: The Commission

COMMENTS OF FRANK MERRITT

These comments are offered in response to the Commission's Notice of Proposed Rule Making in the above-captioned matter. I support the proposal to set aside 222-222.150 MHz for non-repeater use.

Due to the great number of FM operators the requirements of non-FM operators and operations runs a risk of obfuscation. There have been in the past, are now and will be in the future great challenges that non-FM operators will deal with. Since most non-FM operators do not operate frequently and on a daily basis it is easy to conclude that their contribution is negligible. Code (CW) and SSB operators are the leading edge of UHF and above technology and are continuing to make significant contributions to the overall UHF and above technology.

There are a number of very marginal operations that must be carried on in a protected environment due to the low signal levels that are involved. Earth-Moon-Earth (moonbounce) communications as well as meteor scatter and aurora communications require a low signal environment to be practical. A very brief perusal of extant journals dealing with these weak-signal modes reveals that there is presently an infrastructure of operations that are only possible in a weak-signal environment.

FM operations and in particular FM repeaters are large-signal operations. Their popularity is encouraging but some perspective must be maintained regarding the fact that this is not the ONLY operation that is taking place in these UHF bands. The general level of technology today at 1 GHz and above may be likened to the situation immediately after World War II at 30 MHz. The great challenges today exist at and above 1 GHz. It is the opinion of this operator that a great wrong would be done to make low-level CW and SSB operation impossible due to a great proliferation of relatively high-power FM operations.

In a copy of the Western States VHF/Microwave Society (P.O. Box 35, Lomita, CA 90717-0035) dated 1 February I have read of proposed Microwave Band Plans. In my opinion this is very exciting in that both the general level of technology has increased and band occupancy now requires more organization in terms of frequency allocations. Equipment is now available and practical to permit SSB operation on X-Band (10 GHz band). This is

typical of the developments of technology that would be impossible without a compatible spectrum to operate in.

From my perspective it would be very far-sighted and wise for the FCC to make allowance for weak-signal operation on the 222MHz band as well as other VHF, UHF and Microwave bands. It is my vista that the future will be full and challenging for weak-signal operations in these spectrums.

Respectfully submitted,

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