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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of )  
 )  
Amendment of Parts 2 and 97 of )  
the Commission's Rules Regarding )  
an Allocation of the 216-220 MHz )  
Band for the Amateur Services )

RM-7747  
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To: the Commission

OCT 23 1991

Federal Communications Commission  
Office of the Secretary

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COMMENTS ON RM-7747

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Bruce O. Jordan files these documents in the FCC's Petition  
for Rule Making RM-7747.

Bruce O. Jordan  
P.O. Box 2428  
Saratoga, CA 95070-0428

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October 21, 1991

## EXPERIENCE

My background includes many years of communications experience, both amateur and professional. My first FCC license was the Radio Telephone Operator License First Class, P1-12-10666, granted August 3, 1966. It is now the General Class License. My Amateur Radio License Technician Class, WA6YLV, was granted July 20, 1973. I also hold the NABER Certified Technician Certificate, No. 17559, issued June 30, 1989. I am a graduate of the California State University at San Jose.

My first communications job was as a dispatcher for police and fire in my hometown. It was there that I began to learn about co-channel sharing and frequency congestion.

I worked for Motorola Communications & Electronics from 1973 to 1979 as a Field Technical Representative and as a Project Manager. I managed the implementation of large public safety radio systems. During that time, and since then, I have worked to identify and resolve many interference problems. I coordinated with the local FCC field office when necessary. I have also used my First Class License on occasional FM broadcast station assignments.

## EXPERIENCE

Having been a radio amateur since 1973, I am on the technical committees of 3 different repeater groups. I am a member of the Northern Amateur Relay Council of California. I have been directly involved in the construction and installation of many amateur repeaters. Of special pleasure is the repeater that provided emergency communications aid to the Red Cross during the California earthquake of 1989. It provided the link between the SF Bay Area and Santa Cruz and Monterey Counties.

Recently, I have been looking into the Automated Maritime Telecommunications System (AMTS) that was just expanded by the FCC in the Docket 88-371 (RM-5712) to cover the balance of the United States. I will be involved in the implementation of new systems.

Based on those experiences and interests I feel qualified to comment on the RM-7747 about both services sharing the 216-220 MHz spectrum.

I fully support the Petition for Rule Making, RM-7747, as filed by the ARRL with the Commission. Allowing the secondary access by Amateurs to these frequencies is a positive action for both the Amateur Service and the AMTS service. I will explain my position in the following paragraphs.

First, there is a strong need for this spectrum to support the Amateur operations that were displaced by the loss of 220-222 MHz in Docket 87-14. As was well explained in filings on that Docket, and this petition, this frequency range is very desirable for the high speed packet networks as well as other point-to-point networks because of emission limitations and propagation characteristics.

Next, allowing the Amateur Radio Service to share these frequencies with the Maritime Services would be an excellent re-use of spectrum that would otherwise be relatively vacant away from the Coastal regions and the Mississippi River Valley. A major use by the Amateur Service would be cross-country high-speed digital networks. Most of these would not be anywhere near a coastal region. And proper coordination could allow crossing the Mississippi without degrading either service. I feel this would fit the FCC's expressed

I have reviewed the studies presented in support of this petition and feel that they prove, very conservatively, that with requirements for coordination and non-interference, the Amateur Service could co-exist on a secondary basis with the other users of these frequencies. TV operations should also be well protected from interference with adequate separation. As the Commission pointed out in Docket 88-371, 14, about interference to TV reception by Watercom's AMTS operations:

"We emphasize also that no one has brought to our attention any indication that interference has occurred from Watercom's operations, including WLOX, whose channel 13 station at Biloxi, Mississippi, is bracketed by Watercom coast stations at Mobile and Bay St. Louis."

This shows that proper coordination will prevent interference to TV viewers. In the event of a valid complaint the burden is on the AMTS or Amateur station to eliminate the interference or cease operation.

The sharing of these frequencies could be carried out without additional administrative burden or cost to the government and the public for coordination. The ARRL has volunteered to handle the coordination, guiding the Amateurs in selection of frequencies and operating parameters (if the Amateur doesn't have the experience or equipment to do a

spectrum analysis) and alerting them to any changes in the AMTS or other existing user stations or to new stations.

I also feel that the sharing arrangement could work with the proposed Interactive Video Data Service should it be approved. Amateur Radio operations of the nature intended in this Petition have no alternative frequencies available but my opinion is that IVDS would be better placed within the cable system it is proposed to support.

In conclusion, I want to repeat, that having examined the technical data presented, and being familiar with the nature of communications systems, I encourage the Commission to adopt this RM-7747 as proposed. This would allow Amateur Radio use of 216-220MHz on a secondary, fixed basis.

*Bruce O Jordan*  
*10/21/91*