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Docket-222

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

30 MAR 1993

POLICY & PLANNING
BRANCH ROOM 5202

IN REPLY REFER TO:
7330-7/1700A3

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APR 1 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Honorable Don Edwards
House of Representatives
Washington, D.C. 20515

Dear Congressman Edwards:

This is in reply to your letter of March 12, 1993, in which you inquired on behalf of several of your constituents regarding the Notice of Proposed Rule Making (Notice) in PR Docket No. 92-235, 57 FR 54034 (1992). This Notice proposes comprehensive changes to the Commission's Rules governing the private land mobile radio services operating in the frequency bands below 512 MHz.

Your constituents are specifically concerned about the impact of these changes on radio control (R/C) hobby users. Enclosed is a discussion paper concerning our proposals for the 72-76 MHz band. In short, we expect there would be no adverse impact on R/C operations because of any proposal contained in the Notice.

We are, of course, sensitive to the concerns of both users of private land mobile radio spectrum and R/C hobbyists. We will, therefore, take your constituents' concerns into account when we develop final rules in this proceeding. As indicated in the Notice, we remain convinced that without significant regulatory change in radio operations in the bands below 512 MHz, the quality of communications in the private land mobile radio services will continue to deteriorate to the point of endangering public safety and the national economy.

We want to thank you for your interest in this proceeding. Your constituents' letters will be included in the record of the proceeding. We expect final rules to be issued in 1994.

Sincerely,

Richard J. Shiben

Richard J. Shiben
Chief, Land Mobile & Microwave Division
Private Radio Bureau

Enclosures
cc: ..

CNTL NO - 9301239

Chief, PRBureau
Chief, LM&MDivison
Docket Files, Room 222
P&P Branch File (Pink)

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Congressional

DUE: 3-24-93

PLEASE MAKE 2 EXTRA COPIES OF INCOMING, ATTACHMENTS, AND REPLY FOR DOCKET FILE, ROOM 222.

CONGRESSIONAL CORRESPONDENCE TRACKING SYSTEM
03/17/93

LETTER REPORT

CONTROL NO.	DATE RECEIVED	DATE OF CORRESP	DATE DUE	DATE DUE OLA(857)
9301239	03/17/93	03/12/93	04/06/93	

TITLE	MEMBERS NAME	REPLY FOR SIG OF
Congressman	Don Edwards	BC

CONSTITUENT'S NAME	SUBJECT
several	inq. comments on PR Docket 92-235

REF TO	REF TO	REF TO	REF TO
PRB/KM			
3-17-93			
DATE	DATE	DATE	DATE

DON EDWARDS
10TH DISTRICT, CALIFORNIA

COMMITTEE ON
JUDICIARY

CHAIRMAN
SUBCOMMITTEE ON
CIVIL AND
CONSTITUTIONAL RIGHTS

COMMITTEE ON
VETERANS' AFFAIRS

Congress of the United States
House of Representatives
Washington, DC 20515-0510

WASHINGTON OFFICE:
(202) 225-3072

DISTRICT OFFICES:
1042 WEST HEDDING STREET
SUITE 100
SAN JOSE, CA 95126
(408) 345-1711

PR
1239

March 12, 1993

Chairman James Quello
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

Dear Chairman Quello:

My office has received a number of letters regarding PR Docket No. 92-235, revisions to the private land mobile radio services. I have enclosed these letters and ask that you please include these comments in the public record.

Thank you for your assistance.

Sincerely,

Don Edwards

Don Edwards
Member of Congress

DE:jw

San Jose, Calif.
Feb. 19, 1993

Honorable Congressman Don Edwards
U.S. House of Representatives
Washington, D.C.

Dear Congressman Edwards:

I am retired and involved with sport of Radio Control Modeling. I am presently a Member of the Santa Clara County Model Aircraft Skypark Club, located at 10250 Monterey Road. I enjoy building and flying radio controled (R/C) aircraft. At the begining of 1991 our sport under went the changing of all our radio equipment to insure we meet new guidelines set forth by the FCC to keep our hobby safe. I presently own two radio control systems and three different models. and have a workshop full of products. equip-

January 28, 1993

The Honorable Don Edwards
United States Senate
Washington, D.C. 20510

Dear Senator Edwards,

FEB - 4 1993

I am retired and derive many hours of enjoyment from building & operating Radio Controlled Model Airplanes. I am very concerned about the proposed rules that are currently under consideration by the Federal Trade Commission (FCC). The proceeding is PR Docket 92-235. If adopted, the 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 used primarily 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 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 wingspans of up to ten 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.

I do not think it 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 considerable investments 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

Joseph P. Mees

Joseph P. Mees
910 W Dunne Ave.
Morgan Hill, CA.
95037

Congressman Edwards, it's not to often that the federal agencies do something to really hurt a specific group of people, but; in the case of PR DOCKET 92-235 th...

FREDERICK Q. JOHNSON, PhD
CONSULTING ENGINEERING
2990 Archwood Cir.
San Jose, California 95148
Tel: (408) 238 8357
Fax: (408) 238 8357

FEB - 2 1993

FAX COMMUNICATION

To: THE HONORABLE DON EDWARDS
U.S. HOUSE OF REPS
WASHINGTON, DC 20515 244 9784

Subject: FCC RULES PR DOCKET 92-235
VOTE NO

Number of Pages: 1

THIS DOCKET OF PROPOSED FREQUENCY CHANGES WILL UPSET OPERATIONS OF MANY SYSTEMS IN USE CURRENTLY DUE TO VERY CLOSE 2.5 KHz

THE SPREAD OF THE NORMAL

11 February, 1993

The Honorable Don Edwards
2307 Rayburn Office Building
Washington, DC 20515
(202)245-3072
(408)345-1711

FEB 22 1993

Dear Mr Edwards,

I am concerned about Federal Communications Commission Notice of Proposed Rule Making, PR Docket 92-235. If approved, this Rule would allow new commercial channels between those currently used by the Radio Controlled (RC) model industry for transmitters and receivers.

As one of my representatives in Washington, I need your help to make sure that my interests are considered when reviewing this Rule. Please read the attached letter that I have sent to the FCC for some specifics.

I would appreciate your using any influence you have to make sure all sides are considered in this matter.

Thank you,

Glen Miller
2658 Poplarwood Way
San Jose, CA 95132
(408)945-7929

PS. This is totally unrelated but since I'm writing anyway.....

I support a federal tax increase on gasoline. I would like to see the revenues directed towards the building and promotion of mass-transit systems, alternative fuels, ecological concerns and highway infrastructure improvement. I don't consider $.50 to $1.00 per gallon to be too much. You can use it for debt reduction too but not as an excuse for increasing the budget.

February 11, 1993

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

Dear Sirs,

I have become aware of a Federal Communications Commission (FCC) Notice of Proposed Rule Making (NPRM). It is my understanding that this NPRM, PR Docket 92-235, if approved, would allow new commercial channels between those currently used by the Radio Controlled (RC) model industry for transmitters and receivers. I am concerned about the addition of these new channels.

Basically, I am a RC hobbyist. I build and fly RC model airplanes. I am concerned that if these new channel are approved, the RC channels I use will become obsolete or unusable.

I am not an unreasonable person. I understand that technology changes and that we must consider new commercial uses of our airwaves. However, I want to make sure that my interests are considered too. There are hundreds of thousands of RC modelers like myself. We have all invested a fair amount of money in radio equipment. Before we are asked to replace this equipment, I want the decision makers involved to consider the burden it may cause. It may simply be cost prohibitive to make radio equipment with frequencies and bandwidths which are hardened from these new adjacent frequencies.

I have even greater concern that we may loose the RC frequencies completely. I really enjoy this hobby. As a profession, I am a mechanical engineer. I can honestly say that I have learned things through this hobby that have made me a better engineer. It would be incredibly unfair if these new commercial channels not only squeezed us out of our hobby but actually took away a real world learning opportunity from people like myself.

Of course there are the RC manufactures and retailers in this country which could be severely hurt by restrictive new technical requirements or a simple loss of a market.

Please consider the interests of the RC modeling community when evaluating this FCC NPRM, PR Docket 92-235.

Thank you,

Glen Miller
2658 Poplarwood Way
San Jose, CA 95132
(408)945-7929

Jan. 26, 1993

The Honorable DON EDWARDS

Dear MR. EDWARDS,

I'm am involved with the sport of Radio Control modeling. I'm presently a member of the Santa Clara County Model Aircraft Skypark, located at 10250 Monterey Road. I enjoy building and the flying of R/C aircraft. In the begining of 1991 we under went the changing of all our Radio equipment to insure that we met the new guidelines set forth by the FCC and to keep our hobby safe. I presently own 5 Radio control systems and 6 different models and a have a workshop full of products, equipment and projects necessary to operate my aircraft.

I am very concerned about the proposed rule that is currently under consideration by the Federal Communications Commission (FCC). The proceeding is PR Docket 92-235. If adopted the new rule will greatly reduce the usability of frequencies currently assigned for R/C model use and increase the risk accidents and attendant liability.

Our radio-control frequencies are in the 72-76 MHz band. This band is primaeily used for private land mobile dispatch operations. However, our radio control frequencies in this band are far enough apart from land mobile frequecies that we have been able to share the band without either use interfering with the other.

The Notice of Proposed Rule Making (NPRM) in PR Docket 92-235 replaces Part 90 of the rules with a new Part 88. Part 90 allows for the safe use of R/C aircraft and surface models by keeping a 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 (for R/C aircraft) and 10 of the 30 frequencies on the 75 MHz band (for R/C cars and boats) now used by hobbyists. In fact, more channels will likely be affected.

When we operate our R/C models, we go to great lengths to assure the safety of the operators and bystanders and the protection of property. Many

February 19, 1993

The Honorable Don Edwards
2307 Rayburn Office Building
Washington DC 20515

Dear Mr. Edwards:

I am a new radio control airplane enthusiast, I have been flying for only two years. Though I am new I have as ways been interested in aviation, as a member of the US. Air Force for 10 years and now as a civilian, airplanes are a passion for me.

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. **I am against 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, many 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

ROGER S. BOROVOY
600 HANSEN WAY
PALO ALTO, CALIFORNIA 94306

January 27, 1993

The Honorable Donald Edwards
House of Representatives
Washington, D.C. 20515

FEB - 5 1993

Proposed FCC Change Affecting
Radio Controlled Model Airplanes

Dear Don:

You probably remember me as Intel's General Counsel when we worked together on the Mask Protection Act. I'm writing today about my hobby. I know that radio controlled model airplanes are the last thing on your priority list. However, they are extremely important to us modelers. I love flying! At least when one of these planes crashes, I'm not in it.

There are a lot of us who spend a lot of time on this hobby. There are 300 of us in Gilroy, 100 in Santa Clara and many other clubs all over California. It is tragic when an airplane, which one of us has spent untold hundreds of hours building, crashes unnecessarily. Furthermore, it can be downright dangerous. These planes can be very destructive and accidents have even been fatal on occasion.

The FCC recently issued a Notice of Proposed Rule making (docket 92-235). This new regulation proposes the insertion of two new frequencies between those presently assigned for radio control ("RC") model flying. In plain English, this means that a mobile transmitter could transmit a signal (substantially stronger than our own) which is extremely close (2.5 kHz away) to the frequencies we use to fly. Since these transmitters would be mobile, we would never know when they were in our vicinity. Such a signal makes our planes uncontrollable and a lethal weapon.

Most flying fields use a restricted area. We don't have infinite land in Santa Clara, for example. However, when a foreign signal interferes with our transmission, the model can go anywhere. These models weigh in excess

of ten pounds and at the 60 mph speeds they fly, can do considerable damage to person and property when the radio frequency control is interfered with.

Our model clubs spend a lot of time enforcing safety. This apparently "minor" frequency allocation change (the first of its type in 60 years) could wreak havoc with our safety record.

I earnestly enlist your support in opposing this proposed change.

Very truly yours,

Roger S. Borovoy

RSB:jmk