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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of

Amendment of Section 97.205 (g)
and other Sections
related to Amateur Repeater Stations
including the definition of "Repeater"

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PR Docket 93-85

REPLY COMMENTS OF AN ORIGINAL PETITIONER

To the Honorable FCC COMMISSIONERS:

In January, 1991, Joe Jarrett and I filed a Petition for Rule Making, RM-7649, regarding the responsibility for transmissions over amateur repeaters. On March 29, 1993, the Commission issued a Notice of Proposed Rule Making on this measure.

I am filing these comments by electronic facsimile today, Sunday, August 1, 1993, and am following with multiple copies by regular mail.

Earlier, I filed Comments supporting the proposed construction of 47 CFR § 97.205(g), which states:

(g) The control operator of a repeater is not accountable for violative communications that the repeater retransmits inadvertently.

and for the new definition of the term "Repeater," which is:

(36) Repeater. An amateur station that instantaneously retransmits on a different channel the angle-modulated phone or image emission transmission of another amateur station.

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I made one exception for the use of the word "channel," which appears in the definition of "Repeater" and one other place in the rules, which should be changed to read "frequency," as the amateur service is not channelized.

I have obtained copies of comments by the Oregon Region Relay Council, the Colorado Council of Amateur Radio Clubs, the Portland Amateur Radio Club (Portland, Oregon), the Technology Radio Amateur Club (Beaverton, Oregon), the Valley Emergency Radio Association (Chatsworth, California), Jan A. Tarsala (Jet Propulsion Laboratory, Pasadena, California), James D. Wagner (Tangent, Oregon), Keren Smith (Oregon), Alfred T. Yerger II (Newburgh, New York), Paul Schrader (Louisville, Kentucky), Lee Sutherland Parr (Monroe, Virginia), and Jim Reece (Nacogdoches, Texas).

The office of Chris Imlay advises me that the comments of Keren Smith are representative of 27 other Oregon voice repeater and packet radio operators.

It seems that any time a rule is proposed or adopted, there is discussion about what it may or may not mean in a practical sense. It seems some of the concerns about "a great number of unintended consequences" or that the "purpose of the docket is not accomplished" may not be merited.

One of the issues is the delay lines used in voice repeater controllers. These brief delays facilitate the muting of touch tones and squelch tails from being retransmitted. I own an Advanced Computer Controls model RC-850 repeater controller (with version 3.8 software), which uses such a delay line. The delay time involved is very short. Simultaneous listening to the input and output frequencies of repeaters using such controllers essentially provides an echo effect. I could not imagine the kind of enforcement by the Commission that has been the subject of concerns expressed by some participants. I do not believe the proposed language would impact these short delay lines. The time of the delay is such that it would not be possible for a control operator to treat communication content differently than if it were strictly instantaneous.

The comments of Mr. Jan A. Tarsala, trustee of a club station at the Jet Propulsion Laboratory in Pasadena, California, are well taken. Voice repeaters should not be restricted to angle modulation. Amplitude companded single

sideband and similar techniques should be accommodated. The language in the rules should be adaptable to any new modulation formats that may be permitted. Perhaps it will be possible to construct language that will include all the formats, except for those that involve message storage and retransmission where there is a statutory responsibility of the first forwarding station as well as the originating station for message content.

Regarding the comments of Mr. Lee Sutherland Parr of Monroe, Virginia, I see no problem in the proposed rule with the mechanics of packet. In regard to these comments, and several others who want a sole responsibility on the originating station, it is my opinion that there should be a "human checking" of a packet message by the first forwarding station, before it enters a high speed network. Contrary to what is stated by several participants, stations are able to comply with such requirements. I observe no real hardship. These participants should be concerned with what can take place when malicious individuals transmit false messages, perhaps with false call signs, into a system. The kind of conduct we have on voice repeaters with fictitious call signs (some of them representing obscene meanings) should be checked. The requirement for responsibility of the first forwarding station is practical and appropriate.

I disagree with participants who suggest that the proposed 47 CFR § 97.205(g) is inappropriately placed in the rules. I believe the heading of "Repeater Station" is appropriate.

I have worked on this issue over a period of three years. At this time I would make a special request that when Commission action is scheduled on PR Docket 93-85, I be notified so I may personally attend the meeting in Washington.

Respectfully submitted,

A handwritten signature in black ink that reads "Tom Blackwell". The signature is written in a cursive style and is positioned above a horizontal line.

Tom Blackwell, N5GAR

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