

Russell Stringfield, KB5SCM; A.R.R.L.; R.A.C.E.S.

Chairman
KiloCycle Club of Ft. Worth
3516 Paint Trail St.
P. O. Box 6910, Fort Worth, TX 76115
Fort Worth, Texas 76115

Telephone (817) 244-3684
Fax (817) 244-3684 press 8

DOCKET FILE COPY ORIGINAL

RECEIVED
MAY 3 1995
MAIL ROOM

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

In the Matter of Amendment of Part 97)
of the Commission's Rules to Eliminate)
Certain One-Way Communications in the)
Amateur Radio Service Medium and High)
Frequency Bands)

RM-8626

To: The Commission

COMMENTS ON A PETITION FOR RULEMAKING

Russell E. Stringfield, licensee of Amateur Radio Station KB5SCM, hereby responds to the above-captioned Petition filed by Fredrick O. Maia.

These Comments concern only excessive amateur voice broadcasts on the high frequency bands. These comments take no position regarding non-voice or innocuous, ancillary one-way HF amateur voice transmissions.

There has been a lot of comments on this matter, mainly from the American Radio Relay League (A.R.R.L.) of which I am a member of. Although most of these comments have been negative to Mr. Maia, I support his position on this petition to one extent. There are certain stations in the amateur service that take advantage of §97.111 (b) (6).

I feel that these stations are indeed in violation of §97.113 (b). These few stations that are engaged in these operation practices are taking advantage of a crack in the rules and regulations that make this a great service.

Although these few offenders are the exception, Mr. Maia's proposal will definitely hurt a majority of amateurs because it will also effectively shut down the A.R.R.L.'s station W1AW, which operates within the "good graces" of the rules and regulations.

It is true that information can be passed on through the Internet, which requires the purchase of a computer, and

No. of Copies rec'd 025
List ABCDE Wireless

access to the Internet. Both of these can be relatively expensive, especially for something which we were getting for free.

It is true that information can be passed on through packet radio, again requiring the purchase of a computer, and a terminal node controller. Even then some areas of the country do not have digital repeaters set up. Again limiting access to some who are less fortunate.

It is true that information can be passed on through VHF/UHF repeater networks, but by the time the information can be passed on it can be changed from original content, or be out of date.

These few people, who are "bending the rules" and creating ill will in the international community of amateurs, are just that, a few people. They have no large organization behind their activities, and have no motive except their own views to be known.

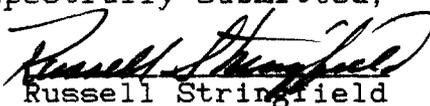
The A.R.R.L., on the other hand, has been very informative to the vast majority of amateurs in America, and the world, today. Their views are not just theirs, they are formulated by just thought, and for the benefit of all.

Therefore, I suggest an alternative to Mr. Maia's proposed rule change.

The rule change should be amended to state:

Sec. 97.113 (d) The control operator of a club station may accept compensation for the periods of time when the station is transmitting telegraphy practice or information bulletins, provided that the station transmits such telegraphy practice and bulletins for at least 40 hours per week; schedules operations on at least six amateur service MF and HF bands using reasonable measures to maximize coverage; where the schedule of normal operating times and frequencies is published at least 30 days in advance of the actual transmissions; and where the control operator does not accept any direct or indirect compensations for any other service as a control operator; and where the club has a verifiable membership which exceeds 200,000 or more members.

Respectfully submitted,

By: 

Russell Stringfield

Amateur Radio Station KB5SCM
Fort Worth, Texas 76116

April 28, 1995