

Before the
Federal Communications Commission
Washington, DC 20554

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FCC MAIL ROOM

In the Matter of)

Amendment of Part 95 of the)
Commission's Rules to)
Establish a Very Short Distance)
Two-Way Voice Radio Service)

WT Docket 95-102

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Comments to a Notice of Proposed Rule Making

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Date September 29, 1995

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DJH

I am an Amateur Radio (NOSWH), and General Mobile (KAF1279) licensee. Since obtaining my Amateur Radio License in June, 1992, the majority of my operation has been in the use of VHF and UHF repeaters. I have also used repeaters in the General Mobile Radio Service (GMRS) since obtaining a GMRS license in October, 1993. Formerly a member of Gateway REACT, I have logged thousands of hours on the Citizens Band (CB) primarily on Emergency Channel 9. More than half of my activity in all three of the above mentioned bands has been in Public Safety service to my local community. In light of the above, I seriously and sincerely submit the following:

Let the record show that my cumulative experience in radio operations, and familiarity with unlicensed, unaccountable radio behavior tell me that any allowance of unlicensed, whether truly personal or disguised commercial operation in the current GMRS band is "misplaced compassion" for the manufacturers and end users of the Family Radio Service (FRS) described in the Notice of Proposed Rule Making (NPRM), Docket 95-102. 'Misplaced' is used dichotomously here.

First it refers to literally misplacing the FRS in the GMRS band. The effects of coupling licensed and unlicensed users in the same band (no matter how well intentioned), inevitably results in chaos. Confusing to me is this sudden about-face by the FCC. The FCC has consistently opposed licensed and unlicensed services on the same frequencies and wisely so. Worst of all, if allowed to transmit on the 467 MHz interstitial frequencies using CTCSS tones, users will unknowingly cause harmful interference to GMRS repeaters and this could actually cost someone their life.

For example, when I worked for REACT, I received many calls about severe traffic accidents. People were lying, bleeding on the road, sometimes trapped in overturned vehicles, and I couldn't get help to them because of the extreme interference, (sometimes sickly intentional), on or adjacent to Emergency Channel 9. I've taken similiar calls on GMRS repeaters experiencing some ignorant and non-personally licensed users who failed to monitor open squelched before transmitting on another repeater with a different CTCSS tone. However, it is still nowhere nearly as bad as the CB for now; but allocating the FRS in the GMRS would be an advanced step in that direction.

I recommend the 900 MHz band. Many of my neighbors and I now use the newer digital 900 MHz cordless phones. Reception is crystal clear, and we no longer interfere with each other like we did down on 46/49 Mhz. The propagation of radio waves at 900 Mhz would be ideal for shopping in malls, short car to car communications, etc. Clearly, this is where the FRS belongs, and like it or not, 50 year old analog technology is on the way out. Best of all for the manufactures, 900 MHz radios would sell like "hot cakes", and with the manufacturer in mind comes the second meaning to "misplaced compassion".

I have friends who work for Tandy (Radio Shack), as well as being a regular customer, and one thing has always been obvious. From the sales representative behind the counter, to the store manager, and all the way up to the way up to the

marketing executives in Fort Worth, Texas, Tandy is an aggressive sales entity and has one thing on its collective mind - selling radios. They couldn't care less about the harmony on the GMRS, Amateur Radio, or Citizens Bands. However, wanting to sell radios in a Capitalist Based Society is understandable, hence I have limited compassion for Tandy, Motorola, Maxon, etc. But this compassion becomes misplaced when selling radios becomes more important than preserving the quality of interference free communications for legitimate, responsible, personal licensees.

The majority of the compassion should go toward those who are discouraged from licensed operation by an arduous licensing process. As a result, I recommend that the FCC listen to the Personal Radio Steering Group (PRSG) regarding simplification measures in licensing. After all, the GMRS already is a personal, family radio service, and with easier licensing those who would otherwise be intimidated by licensing, could become legitimate GMRS users. Hence, current licensees are not "turfin" the GMRS band as has been suggested. On the contrary, we would welcome new licensees who would discover that licensing wasn't so hard after all. This, in turn, would allow Tandy, Motorola, Maxon, etc., to sell more GMRS radios to all the new licensees. In a "nut shell", either allocate an unlicensed FRS in the 900 MHz band, or simplify GMRS licensing so prospective users won't be frightened away.

Last but not least is the issue of GMRS repeater interference as was briefly mentioned above. The following scenario is common knowledge to many GMRS licensees:

If Repeater "A" has a transmitting (output) frequency of 462.675 MHz, and a receiving (input) frequency of 467.675 MHz, and Repeater "A" is activated by receiving a CTCSS tone of 103.5 Hertz on the 467.675 input frequency, then the following is true: If a new FRS user transmits on the interstitial frequencies of 467.6625 or 467.6875 MHz, which are only 12.5 kHz away from 467.675 MHz (Repeater "A"'s input) using a 103.5 Hertz CTCSS tone (even using the proposed half watt FRS radio), then Repeater "A" could be activated causing harmful interference to the licensed users of Repeater "A". This scenario is simply not acceptable or fair to legitimate, truly personal GMRS licensees. The height of the repeater's receiving antenna in relation to the half watt portable radio is what matters. I personally use a half watt with my portable to conserve battery power, and I've activated repeaters up to 20 miles away.

Let me summarize by imploring each FCC Commissioner to do what is ethical. Please, either employ the licensing simplifications recommended by the PRSG in order to bring otherwise would be unlicensed FRS users, into the licensed GMRS family, or allocate an unlicensed FRS in the Part 15, 900 MHz band using spectrum saving technology. Otherwise, I fear with many other licensees, that the current GMRS will begin to spiral down toward the most unfortunate fate that befell the Citizens Band.

Respectfully,
James P. Robeson KAF1279