

RECEIVED

DOCKET FILE COPY ORIGINAL

RM 9267

Secretary

Federal Communications Commission

1919 'M' St., NW

Washington, DC 20554

MAY 22 1998
COMMUNICATIONS ROOM

May 11, 1998

Dear Secretary,

I wish to file a comment to FCC Petition RM 9267. I am an Amateur Radio (Extra Class) Licensee and have been continuously licensed since 1952. I use several modes of communications in the 70 cm band (420 – 450 MHz) for; Public Service Communication, recreation and experimentation. I have a considerable amount of money tied up in equipment that I use in my hobby for this particular band which has been accumulated over a great number of years. If this band were to be reassigned to Private Mobile Radio Service (PMRS) it would present to me and many others alike a monumental economic burden in unusable equipment. And, it would deny over three quarters of a million Ham Radio Operators like myself, in the United States, use of this band that is now shared with some Government operations (Wind Profilers, for example). The Ham Radio Community is a self policing, spectrum conserving entity that would find such a reassignment of the 70 cm band very distasteful in that it would cripple much of our Public Service, Satellite Service, Small Signal (Meteor Scatter, Tropospheric Scatter, Aurora Scatter, Propagation Study) Operations. It bothers me very deeply that every time a 'service' thinks it needs more radio frequency spectrum, the Amateur Radio Bands seem to be fair game. We have pioneered this portion of the spectrum and made it possible for new industries to be created. Why are we thanked for our efforts by the constant threat of having our bands usurped for reassignment to services that have never shown any sort of spectrum conservation? If PMRS were to use their assigned spectrum efficiently and effectively they would have more channels to assign than they would have takers. Most all of these Land Mobile radio services are running 15 kHz wide Frequency

No. of Copies rec'd 023
List A B C D E
MMB

Modulation (FM). That has an occupied bandwidth of 36 kHz ($2D + 2F$). Ham Radio Operators use FM also but the deviation is held to 3 kHz, that's a 12 kHz occupied bandwidth, one third of what the commercial folks are doing. Why has nothing been learned over the years? We (Hams) also use the Single Side Band (SSB) mode of communications in the 70 cm band. Using SSB our occupied bandwidth is less than 5 kHz. By using both upper and lower sidebands, 7 channels are available that are now occupied by one commercial channel. Hams also use Intermittent Continuous Wave (CW) the Morse Code mode of communications in the 70 cm band with an occupied bandwidth of approximately 52 Hz this is at a code speed of 13 words per minute (WPM). This is on the order of 690 channels in the same bandwidth that is now occupied by one commercial channel. I am certainly not advocating the use of CW for Land Mobile work but what I am attempting to point out is the fact that the commercial folks cry for more bandwidth and have made no attempt to use more efficiently the bandwidth that they already have been assigned. Further, with the wide spread proliferation of Trunked Radio, Cellular and PCS it would appear that there are many unused channels within their own allotted spectrum. Even in their own allotted spectrum they could double their channels even using the archaic 15 kHz wide channels and that would be to simply offer the same channels as already assigned but with other than using vertical polarization. A bit of judicious frequency management could bring this to fruition without any fuss. This in conclusion, I have advocated for years but this solution to the ever increasing need for channels has somehow fallen on deaf ears. In closing let me state that I am vehemently opposed to any more usurping of Ham Bands and the curtailing of Ham Radio Activities in the name of progress or need. Let those that think they need more spectrum make more efficient use of what they have, like clean up their own act first.

Yours truly,



Dr. David A. Clingerman, Sc.D. - W6OAL

41641 Dublin Drive

Parker, CO 80138