

Before the
FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of)
)
An Allocation of Spectrum for)
Private Mobile Radio Services) RM-9267
)

To: The Secretary,
Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

I am writing in opposition to the Land Mobile Communications Council's proposal to re-allocate the 420-430 MHz and 440-450 MHz frequency spectrum to commercial, private, land mobile applications. I am brand new to amateur radio; I passed my test a few days ago and expect my call-sign any day now. Already, I have to fight to keep frequencies I haven't even had a chance to use!

As a "no code" Technician, I already have limited access; I don't want that to become even more limited before I even get on the air. I understand the "no code" option is a popular starting point for new hams. I expect there is a bottle-neck of people using the available frequencies - to get access to more frequencies requires learning morse code, something not everyone is up to. That means we can expect the frequencies available to the Technician to become very crowded very soon. Taking away these frequencies will only serve to discourage people from getting their amateur radio license at all.

I've been talking to experienced hams about the different frequencies. It seems 2m is the most popular band, with many repeaters. As a result, 70cm is becoming more popular as a relief from the often crowded 2m band. More and more repeaters are going up as a way to take advantage of this relatively quieter band. So while usage on 70cm may have been low in the past, it is currently on a sharp rise. Again, the new "no code" Technician license means more hams, which means more crowding on 2m and more expanded use of 70cm.

As to the LMCC's request to "share" this band with the amateur service, I can't see how a commercial service can share with a non-commercial service. Without protection for the non-commercial amateur service, business will push hams right off the airways. Right now, hams abide by rules of conduct created to keep the airwaves available for everyone. Commercial enterprises never follow rules of conduct.

5
CODE 087

Instead, they do anything to get an edge over competitors. Since hams would never fight back on the airwaves, we will just get run over. For instance, a ham is supposed to use the minimum power required to make the contact. Do you think a car service dispatcher will do the same? Or will they crank up the radio all the way to step on any other transmission that might get in there way? If a ham hears a transmission in progress, he is supposed to wait till it is finished before attempting to transmit. Can you imagine a business waiting? Hams don't violate these rules because they enjoy the hobby and want to keep it alive. Everyone knows businesses violate every rule they can to get ahead unless they are strictly monitored and penalized. My point is this: it would be impossible for a non-commercial service to share any type of resource (not just radio waves) with a commercial service and expect to survive. Money always beats good-will.

Finally, if this reallocation goes through, where is it going to stop? Wireless technology is the star of the '90s. There will always be a need for more space & more bandwidth. But, at some point, you have to say "No, you have to work with what you have." Otherwise, I fear amateur radio will be relegated to the history books. Amateur radio deserves protection – just like national parks are protected from land prospectors, just like commercial radio stations with smaller audiences are protected from all becoming top 40 stations. Amateur radio should be regarded as a protected resource.

I respectfully request that you DENY the request of the LMCC to share the Amateur radio allocations at 420-430 and 440-450 MHz. This would only provide temporary relief for the LMCC and can only lead to the complete collapse of the Amateur Radio Service.

Sincerely,

Peter Rabinowitz
121 MacDougal St, Apt 6B
New York, NY 10012

May 20, 1998