

 **Centre  
Communications**  
Two-Way Radio Systems

P.O. Box 119 Rte. 144 South Bellefonte, PA 16823 (814) 355-4818

RECEIVED

MAY 27 1998

May 20, 1998

FCC MAIL ROOM

Ms. Magalie Roman Salas  
Secretary, FCC  
Room 222  
1919 M Street NW  
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Subject: LMCC Petition for Rulemaking (RM-9267)

Dear Ms. Salas,

We are writing to you to express our support of the Petition for Rule Making filed by the LMCC seeking new spectrum allocations for private wireless users. I would like to commend the FCC for placing the petition on public notice in a most expeditious manner.

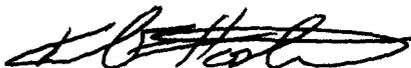
Being a major communications equipment reseller and service provider to our area, we have found that additional frequencies are needed to support our customers and the general public needs. In the past 10 years of business, we have grown from two to seven employees and at the same time, we have grown our wireless communications services to approximately 200 plus businesses. Our own communications needs have grown as we have added employees and communications sites and services.

With the freeze on the 800 MHz frequencies, growth of our economic area and additional demands of other wireless users, our ability to expand coverage areas to where the community(s) need and expect wireless ability can not be met. Many of our customers have expressed disappointment to us because we do not have access to the spectrum that we need to continue to meet their needs. This lack of spectrum has had a significant negative effect on our business and the customers that we provide wireless services to. In many cases, our customers have been unable to effectively run their business, this has resulted in reduced ability to service customers and expand their business.

Some of our customers have tried to use larger wireless providers (PCS, Cellular, etc.) to meet communications needs, however, many have come back to the basic two-way radio for several reasons: ease of use, ability to communicate in areas not served by commercial carriers, immediate access to persons by simply pushing a button and not having to wait for carriers to validate and process a call. In some instances, our customers have saved property and possibly lives by using a simple two-way radio in place of a commercial provider.

In conclusion, by providing additional new spectrum, the communications needs of many existing and new wireless users will be possible. Companies like ours will have access to construct and provide simple yet very effective means of communicating with the people that need its service. I would urge the commission to quickly address the issue of additional spectrum as the problems associated with the lack of spectrum are increasing on a daily basis.

Sincerely,



Karl F. Hosterman

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# David A. Rudawitz

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5/21/98

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DOCKET FILE COPY ORIGINAL

FEDERAL COMMUNICATIONS COMMISSION  
MAY 26 7 1998  
Secretary of the FCC  
Washington, D.C. FCC MAIL ROOM

REF: RM-9267

Dear Commission,

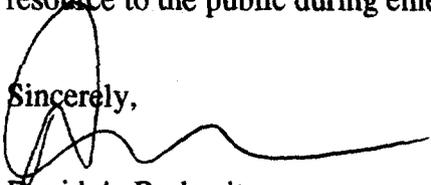
As a licensed Amateur Radio operator, I want to go on record as being strongly opposed to the petition under consideration, RM-9267.

I am very active on many Amateur Radio frequencies that promote the public welfare through emergency, disaster and public service communications. The frequencies stated in RM-9267 (4120 MHz to 430 MHz and 440 MHz to 450 MHz) are crucial to our continued success in serving the public through our work. These frequency band segments include important linking, control and repeater systems used daily in Southern California. We have developed an extensive system in these bands which provides the backbone to area-wide disaster communications for the American Red Cross. Loss of this band will destroy this system and severely impact Red Cross disaster operations.

Amateur Radio has proven to be a successful secondary user to the military radar operations on these frequency bands. RM-9267 contains no technical solutions to provide that Amateur Radio users could continue to use these bands without serious interference if land mobile communications become the primary user.

Amateur Radio operators in Southern California can continue to be a vital communications resource to the public during emergencies and disasters only if RM-9267 is not approved.

Sincerely,

  
David A. Rudawitz  
Office 562-948-8462

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MAY 27 1998

FEDERAL ROOM

15 May 1998

Secretary,  
FCC,  
Washington, DC  
20554  
re: RM-9267 (70cm ham band takeover)

Dear Sirs:

When is corporate greed finally going to take a back seat to the needs of the public? The attempt to ROB the 70cm Amateur Radio Band by the LMCC group is simply ridiculous!

The 70cm band is one of the most popular and necessary "HAM" bands that we have available. It is the band that has the repeater control links for numerous bands, including THE most popular 2 meter band. The rules do not allow control in the 2 meter band; so the majority of control links are in the 70cm band. This band represents the BACKBONE of numerous public service organizations for community disaster plans.

Amateur Television is also in this band. It is now being used, as well, for support of disaster operations for assessment of damage and relief co-ordination.

Please do not allow any changes to our "HAM" bands under the color of false need by the commercial radio community. They are getting relief in the new NARROW BAND requirements that should allow a big increase in available channels. THEY DO NOT NEED OUR PRECIOUS AMATEUR RADIO BANDS! Sharing on a secondary basis would be the death of Amateur Radio as we know it. The commercial intrests would never permit interference of any type!

Thank you for your consideration.

Signed: Gregory K. Chertut WA6PNF

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MAY 21, 1998

RECEIVED  
MAY 21 1998  
MAIL ROOM

FCC  
1919 M ST. N.W.  
WASHINGTON, DC 20554

RE: RM 9267

PLEASE PROTECT OUR 440 BAND. ANY THREAT TO THE 70 CM BAND BY BIG BUSINESS, LEO'S OR OTHER MONEY HUNGRY INTEREST SHOULD BE QUICKLY DISAPPROVED. IT IS THE FCC'S JOB TO PROTECT THE PUBLIC'S INTEREST, NOT LINE THE POCKETS OF LARGE CORPORATIONS. THE 70 CM BAND HERE IN NORTH TEXAS PROVIDES A REGIONAL LINKED SYSTEM THAT COVERS 14 COUNTIES. FOR INSTANT ACCESS FROM SPOTTERS TO THE WEATHER SERVICE IN FORT WORTH. THE AMATUER BAND ALSO PROVIDES EMERGENCY COMMUNICATION IN THE EVENT OF DISASTER. THE AMATUER BAND WAS ALSO FOUNDED FOR EMERGENCY COMMUNICATION IN THE EVENT OF A BREECH OF NATIONAL SECURITY. SHALL WE GIVE UP ALL THIS FOR THE INTEREST OF BIG BUSINESS AND MONEY FOR LARGE CORPORATIONS?

PLEASE PROTECT OUR 440 BAND AGAINST THIS GROUP TRYING TO DESTROY THIS NATIONAL RESOURCE.

SINCERELY,

CARL COOK  
KCY5VP

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List A B C D E

# THAT RAILS AMATUER RADIO LINK SYSTEM

DAVID STEPHENS

RR 2 BOX 527, EASTLAND, TX 76448

(254) 629-3480

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MAY 21 1998  
FCC MAIL ROOM

DOCKET FILE COPY ORIGINAL

MAY 21, 1998

FCC  
1919 M ST. N.W.  
WASHINGTON, DC 20554

RE: RM 9267

ANY THREAT TO THE 70 CM BAND BY BIG BUSINESS, LEO'S OR OTHER MONEY HUNGRY INTEREST SHOULD BE QUICKLY DISAPPROVED. IT IS THE FCC'S JOB TO PROTECT THE PUBLIC'S INTEREST, NOT LINE THE POCKETS OF LARGE CORPORATIONS. THE 70 CM BAND HERE IN NORTH TEXAS PROVIDES A REGIONAL LINKED SYSTEM THAT COVERS 14 COUNTIES. FOR INSTANT ACCESS FROM SPOTTERS TO THE WEATHER SERVICE IN FORT WORTH. THE AMATUER BAND ALSO PROVIDES EMERGENCY COMMUNICATION IN THE EVENT OF DISASTER. THE AMATUER BAND WAS ALSO FOUNDED FOR EMERGENCY COMMUNICATION IN THE EVENT OF A BREECH OF NATIONAL SECURITY. SHALL WE GIVE UP ALL THIS FOR THE INTEREST OF BIG BUSINESS AND MONEY FOR LARGE CORPORATIONS?

PLEASE PROTECT OUR 440 BAND AGAINST THIS POTENTIAL RAPE BY THIS GROUP TRYING TO DESTROY THIS NATIONAL RESOURCE.

SINCERELY,

DAVID STEPHENS  
KB5WB

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**"SERVING THE NATIONAL WEATHER SERVICE"**

Town Bedford, Texas

May 18, 1998

Ref: RM 9267

RECEIVED  
MAY 21 1998  
FCC

Secretary, FCC  
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Dear Sir,

As I look at the vast "Radio Spectrum" I only see very small dots designated for Amateur Radio use. Surely, this minimal group of frequencies cannot mean that much to any organization other than the public citizens of America. Amateur Radio has been the largest group of volunteers to pioneer the use of this radio spectrum, not only in technical development, but also in training a "ready group" of semi-professional operators.

The (450mhz) 70cm band of Amateur Radio is the second most popular band of frequencies, saturated with simplex and repeater connections, linking the Gulf Coast of Texas to/thru Austin to the Dallas/Fort Worth Metroplex and on to West Texas. Any tampering with the allocations of these frequencies will certainly jeopardize the Public Service that can and has been rendered in time of Gulf Coast Hurricanes and local 'weather watches' in conjunction with the National Weather Service for the Tornado Warning System.

Any one replacing the use of these frequencies must be responsible for a complete reimbursement to each Amateur Radio Operator for his/her replacement of equipment for other frequencies, and assume the responsibility to organize a complete Weather Warning System as it is now organized by Amateur Radio.

I would like to go on record as being bitterly opposed to any tampering with these frequencies now and any time in the future.

Name: John H Day  
Call: KC5ZLW  
Address: 936 Dec Lane  
Town, State, and zip Bedford, Texas 76022-7238

I am a member of the Hurst Amateur Radio Club, who operates the Radio Amateur Civil Emergency Service in conjunction with the City of Hurst and Tarrant County.

Signed: John H Day

c: Senator Kay Bailey Hutchison,  
284 Russell Sen. Off. Bldg.  
Washington, DC 20510-4304

Congresswoman Kay Granger,  
100 E. 15<sup>th</sup> St. Suite 500  
Ft. Worth, TX 761002

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# THAT RAILS AMATUER RADIO LINK SYSTEM

DAVID STEPHENS  
RR 2 BOX 527, EASTLAND, TX 76448  
(254) 629-3480

DOCKET FILE COPY ORIGINAL

MAY 21, 1998

RECEIVED  
MAY 21 1998  
COMMUNICATIONS SECTION  
FCC  
1919 M ST. N.W.  
WASHINGTON, DC 20554

RE: RM 9267

ANY THREAT TO THE 70 CM BAND BY BIG BUSINESS, LEO'S OR OTHER MONEY HUNGRY INTEREST SHOULD BE QUICKLY DISAPPROVED. IT IS THE FCC'S JOB TO PROTECT THE PUBLIC'S INTEREST, NOT LINE THE POCKETS OF LARGE CORPORATIONS. THE 70 CM BAND HERE IN NORTH TEXAS PROVIDES A REGIONAL LINKED SYSTEM THAT COVERS 14 COUNTIES. FOR INSTANT ACCESS FROM SPOTTERS TO THE WEATHER SERVICE IN FORT WORTH. THE AMATUER BAND ALSO PROVIDES EMERGENCY COMMUNICATION IN THE EVENT OF DISASTER. THE AMATUER BAND WAS ALSO FOUNDED FOR EMERGENCY COMMUNICATION IN THE EVENT OF A BREECH OF NATIONAL SECURITY. SHALL WE GIVE UP ALL THIS FOR THE INTEREST OF BIG BUSINESS AND MONEY FOR LARGE CORPORATIONS?

PLEASE PROTECT OUR 440 BAND AGAINST THIS POTENTIAL RAPE BY THIS GROUP TRYING TO DESTROY THIS NATIONAL RESOURCE.

SINCERELY,

DAVID STEPHENS

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**"SERVING THE NATIONAL WEATHER SERVICE"**

DOCKET FILE COPY ORIGINAL

RECEIVED  
MAY 21 1998  
COMMUNICATIONS SECTION

FCC  
1919 M ST. N.W.  
WASHINGTON, DC 20554

MAY 21, 1998

RE: RM 9267

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SINCERELY,

NELDA STEPHENS  
KB5CTT

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List A B C D E

Caltech Amateur Radio Club  
Winnett Student Center 207-51  
Pasadena CA 91125

May 22, 1998

RM 9267  
Secretary  
Federal Communications Commission  
1919 M St., NW  
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Dear FCC:

The Caltech Amateur Radio Club (CITARC) is writing to oppose the Petition designated RM 9267 for the following reasons:

- 1: CITARC comprises over 75 members consisting of licensed radio amateurs of all classes;
- 2: CITARC is an integral component of the emergency service plans for the California Institute of Technology;
- 3: CITARC owns and maintains a repeater in the 420 - 450 MHz amateur radio band;
- 4: CITARC members use its repeater for the following purposes: emergency service and personal communication;
- 5: CITARC has made significant monetary investments in this repeater, in excess of \$15,000, not including the extensive personal investment made by CITARC members;
- 6: If the band is taken away, it is highly probable that CITARC and CITARC members will not be able to make a similar investment in another band;
- 7: If the band is taken away, it is highly probable that CITARC's emergency service capabilities will be severely degraded;
- 8: CITARC, now licensed as W6UE, has been active in promoting amateur radio since 1923.

Yours truly,



Yin Lung Shih, N9YS  
CITARC Secretary-Treasurer

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List A B C D E

# WESTERN INTERTIE NETWORK

2040 Hawley Drive, Vista, CA 92084  
Phone: 760/ 724-4020 Fax: 760/ 941-1601

May 15, 1998

DOCKET FILE COPY ORIGINAL

Secretary  
Federal Communications Commission  
Washington DC, 20554

RE: RM 9267

Gentlemen,

It has come to our attention that the LMCC is demanding that you immediately reallocate most of the 420 to 450 MHz band presently in the amateur radio service. We strongly oppose any such action!

The 420 to 450 MHz amateur radio UHF band is the second most popular of the amateur radio services' VHF and UHF allocations. There are thousands of FM repeaters operating daily from 440 to 450 MHz, and a variety of modes on the air every day in the 420 to 430 MHz segment, including thousands of point to point links, and a very mature amateur television fraternity.

We at the Western Intertie Network (the WIN System) presently operate five high level UHF repeaters in the 440 to 450 MHz segment, covering from Southern Arizona to Central California, including all of the seven Counties of Southern California. We also operate ten point to point full duplex links.

Our group, the WIN System, has been affiliated with the San Diego County RACES emergency preparedness organization for years, and because of our wide area coverage, we have been able to handle innumerable pieces of emergency traffic during three major fires and two major earth quakes. It is impossible to estimate how many lives we have directly touched during emergencies, however, I am certain we have been a major communications force during these times of emergencies.

The WIN System also routinely operates many of our repeaters for public safety missions. Several times each year WIN System repeaters are used to handle communications at various Marathons, 10K runs, Bicycle Events, and Special Olympics Events for the handicapped. These public service communications activities would be impossible to achieve without the 440 MHz amateur band "wide area coverage" repeaters operated by the WIN System, and donated to public service.

We therefore strongly urge you to deny the demands of the LMCC. We as amateur radio operators continue to provide the above services free to the public. There is never a charge for either the 440 MHz repeater equipment, or the operators who donate their time and expertise during these times of public service. I do not think the LMCC would likewise provide such services free to the public. Their agenda is to make a profit from these frequencies, not to serve the public, free of charge, as is the amateur credo.

Sincerely,

*Skip Robb KB6NIM*

Skip Robb, KB6NIM  
6166 Lucretia Avenue  
Mira Loma, CA 91752

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Phone: 760/ 724-4020 Fax: 760/ 941-1601

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Sincerely,



Betty Richardson, KC6REV  
722 G Street  
Ramona, CA 92065  
(760) 789-1144

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DOCKET FILE COPY ORIGINAL

To: The Secretary,  
Federal Communications Commission

May 22, 1998

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. Instead, I ask that the Commission change the Amateur allocation from secondary to co-primary with the U.S. government. Prior to the Cold War era, the Amateur Radio Service was a primary status user of these frequencies. With the tremendous success of the modern in-code Technician license and the high growth of Amateur UHF operations, now is the time to restore Amateur Radio's historic primary status within the 420-450 MHz band.

The 420-450 MHz Amateur allocation is the second most used Amateur VHF/UHF band. The LMCC has requested sharing this band with Amateur operations yet provides no explanation for how sharing might occur. Based on the history of sharing with commercial services (particularly the example of AVL companies sharing 902-928 MHz who ordered hams off the air), sharing means that Amateur operations will be evicted from the band. This is what happens when commercial, for-profit services share with not-for-profit, community service oriented Amateur Radio operations. Amateur Radio has and will continue to share its VHF/UHF allocations with mutually compatible services and operations. These have included, the U.S. government, the U.S. military, NOAA doppler wind shear radar and other government radiolocation services. Amateur Radio has a long and proud history of supporting the U.S. armed forces and NOAA through the National Weather Service's SkyWarn system. For these reasons, there is a mutual interest in sharing between compatible services like Amateur Radio and the U.S. government. However, there are no mutual interests in common with for-profit private land mobile services; sharing, as in the AVL example, will result in the loss of 420-430 and 440-450 MHz by the Amateur service, which will prove devastating to the mission of the Amateur Radio service.

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1/12/03  
1/12/03  
1/12/03

Many government agencies and non-profit disaster relief organizations would be tremendously harmed by the loss of the Amateur 420-430 and 440-450 MHz allocations. The following is a partial list of agencies that I have assisted with providing emergency communications via Amateur Radio using the 420-450 MHz band:

Calmont School  
Topanga, CA

Disaster Responce Team of Topanga, CA

Disaster Responce Team of Agoura Hills, CA

Private and for-profit radio services do not have mutually compatible interests with the Amateur Radio Service. Sharing between private land mobile and the Amateur Radio Service, as proposed by the LMCC, will not work. The 420-450 MHz band is the second most used VHF/UHF Amateur Radio allocation. The loss of these frequencies will cause severe disruption to the mission of Amateur Radio, as specified in C.F.R. Title 47 Part 97.1, and will render severe harm to the Amateurís ability to support numerous government and non-profit relief agencies.

I respectfully request that you DENY the request of the LMCC to share the Amateur radio allocations at 420-430 and 440-450 MHz. Instead, I request that the Commission restore Amateur Radioís historic co-primary status in the entire band 420-450 MHz.  
Sincerely,

Merry R. Thomas KD6 GEV  
4351 Overland Ave.  
Culver City, CA 90230

DOCKET FILE COPY ORIGINAL

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

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The 420-450 MHz Amateur allocation is the second most used Amateur VHF/UHF band. The LMCC has requested "sharing" this band with Amateur operations yet provides no explanation for how "sharing" might occur. Based on the history of "sharing" with commercial services (particularly the example of AVL companies "sharing" 902-928 MHz who ordered hams off the air), "sharing" means that Amateur operations will be evicted from the band. This is what happens when commercial, for profit services "share" with not-for-profit, community service oriented Amateur Radio operations.

Amateur Radio has and will continue to share its VHF/UHF allocations with *mutually compatible* services and operations. These have included, the U.S. government, the U.S. military, NOAA doppler wind shear radar and other government radiolocation services. Amateur Radio has a long and proud history of supporting the U.S. armed forces and NOAA through the National Weather Service's SkyWarn system. For these reasons, there is a *mutual interest in sharing between compatible services* like Amateur Radio and the U.S. government. However, there are *no mutual interests* in common with for-profit private land mobile

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services; "sharing", as in the AVL example, will result in the loss of 420-430 and 440-450 MHz by the Amateur service, which will prove devastating to the mission of the Amateur Radio service.

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- Red Cross
- Search & Rescue
- Emergency response team

Private and for-profit radio services do not have mutually compatible interests with the Amateur Radio Service. Sharing between private land mobile and the Amateur Radio Service, as proposed by the LMCC, will not work. The 420-450 MHz band is the second most used VHF/UHF Amateur Radio allocation. The loss of these frequencies will cause severe disruption to the mission of Amateur Radio, as specified in C.F.R. Title 47 Part 97.1, and will render severe harm to the Amateur's ability to support numerous government and non-profit relief agencies.

I respectfully request that you DENY the request of the LMCC to share the Amateur radio allocations at 420-430 and 440-450 MHz. Instead, I request that the Commission restore Amateur Radio's historic co-primary status in the entire band 420-450 MHz.

Sincerely,

Eric Trowbridge KC7YGH  
35096 Hwy 93  
St. Ignatius, MT 59865

May 17, 1998

Secretary, FCC  
Washington D.C.  
20554

MAY 27 1998

FCC MAIL ROOM

DOCKET FILE COPY ORIGINAL

Thursday, May 21, 1998  
Dear Secretary FCC

I am writing to you about RM-9267. This bill covers the amateur radio bands. I am amazed that after the way the Amateur Radio operators helped out during the North Dakota floods of 96 and the Oklahoma Bombing and during the hurricanes, that the FCC would consider taking away from these valued citizens, the same bands that they used to provide this service (at no pay and sometimes putting their lives in harms way).

I urge you to please reconsider any thoughts you may have, of giving these frequencies to any other Corporation or Individual either now or in the future.

PLEASE see attached E-mail from King County Emergency Medical Services Marina Zuetell.

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Respectfully yours,  
Victor Carter N7YPB

*Victor Carter*

|| ||

## Victor Carter

From: Marina Zuetell <zuetell.m@ghc.org>  
To: patrickn@accessone.com; LARRY.PAGE@airborne.com; allenmarks@aol.com; johnnty@aol.com;  
k7ixc@aol.com; K9RKI@aol.com; THardy8664@aol.com; w7tsq@aol.com; wa6ehd6@aol.com;  
matthewk@bestnet.com; klapla@chmc.org; gfiber@cmc.net; tsharp@co.pierce.wa.us;  
72165.1066@compuserve.com; jayr@connectcorp.net; drbob@drbob.seanet.com; kb7tbf@email.msn.com;  
mschone@eskimo.com; oolon@eskimo.com; lmkeeton@foxinternet.net; mcusson@foxinternet.net;  
compuserve.com#062##c#103042#c#513@ghc.org; gemis.ge.com#c#steve#c#goggans@ghc.org;  
glmhf.wa.com.kenb@ghc.org; lefevre.d@ghc.org; lxncorp.com.dgillett@ghc.org; mashell.com.sutton@ghc.org;  
worcester.e@ghc.org; empey@gte.net; HPI@gte.net; lesw7ufi@gte.net; triggs@gte.net; wa7nuu@halcyon.com;  
dbbrooks@hotmail.com; inkling@ibm.net; dick@interisland.net; jhall@isd.net; chipa@isumataq.eskimo.com;  
n7nlc@ix.netcom.com; jimmitch@jetcity.com; ed.leavitt@juno.com; gorgrolnc@juno.com; kb7svu@juno.com;  
kc7cui@juno.com; kc7hyj@juno.com; w7aa@juno.com; wa7ekkbud@juno.com;  
denevanpa@kpnwoa.mts.kpnw.org; GRAHAMDA@kpnwoa.mts.kpnw.org; n7fsp@linux.n7fsp.ampr.org;  
pete.apgar@lmco.com; mckibbin@mail.daka.com; Carlos\_M\_Smith\_at\_ANM450A@mail.hq.faa.gov;  
Allan.Persyn@metrokc.gov; keithcarlin@msn.com; n7nfy@msn.com; pmeeks@msn.com; schiii@msn.com;  
w7srz@msn.com; gnoable@multicare.com; kj7nj@n7fsp.ampr.org; purrdg@ncal.kalperm.org;  
mpickard@netcom.com; gatesj@nova.edmonds.wednet.edu; n7at@nwinform.net; kushal@nwlinc.com;  
nworcest@nwlinc.com; beckw@nwrain.com; paulwj@nwrain.com; rgs@olympus.net; wenzel@olynet.com;  
mvamis@oz.net; adamk@pacificarch.com; rjmiller@pacifier.com; cougarcat@prostar.com; zeke@psrc.com;  
John.McLaren@PSS.Boeing.com; kc7iye@ricochet.net; kc7hxc@seanet.com; k0bq@sincom.com;  
kb7rid@sincom.com; crjones@sprintmail.com; wayne@tssr.com; pamj@u.washington.edu;  
Paul\_Dunn@valleymed.org; redwards@web-o.net; fgabry@whidbey.com; huppert@whidbey.com;  
vanriper@whidbey.com; hwardsil@wolfenet.com; king1@wolfenet.com; mcfeters@wolfenet.com;  
paid@wolfenet.com; David-C-Wright@worldnet.att.net; k7btw@worldnet.att.net; kb7jcp@worldnet.att.net;  
n7ypb@worldnet.att.net; javinsr@wsdot.wa.gov  
Cc: mark.sheppard@ci.seattle.wa.us; duanem@u.washington.edu  
Subject: Fwd: Letters needed to thwart threat to 440 MHz ham band  
Date: Thursday, May 14, 1998 10:18 AM

Some of you may have already heard about this new threat to our 420-450 band. It is vitally important to emergency management and other emergency response organizations to protect this band.

See what you can do to help this effort. Thanks

**Marina Zuetell**  
Enterprise LAN Administration  
A.R.E.S. Emergency Communications Coordinator, N7LSL  
206-901-6566  
E-mail: zuetell.m@ghc.org

Received: from haji.ghc.org  
([164.72.176.64])  
by gwhost; Wed, 13 May 1998 23:14:42 -0700  
Received: from inside.ghc.org by haji.ghc.org (SMI-8.6/SMI-SVR4)  
id XAA29933; Wed, 13 May 1998 23:14:52 -0700  
Received: from [204.122.16.49] by inside.ghc.org  
via smtpd (for ROC356.ghc.org [164.72.176.64]) with SMTP; 14 May 1998 06:13:54 UT  
Received: (from smartlist@localhost)  
by mx2.eskimo.com (8.8.8/8.8.8) id XAA28195;  
Wed, 13 May 1998 23:15:37 -0700 (PDT)

Resent-Date: Wed, 13 May 1998 23:15:37 -0700 (PDT)  
Message-Id: <199805140609.BAA01874@rgate.ricochet.net>  
From: "Bruce Miller" <bruce.miller@pobox.com>  
To: "areswwa-list@eskimo.com" <areswwa-list@eskimo.com>  
Date: Wed, 13 May 98 23:13:54  
Reply-To: "Bruce Miller" <bruce.miller@pobox.com>  
Priority: Normal  
X-Mailer: PMMail 1.92 For OS/2  
Subject: Letters needed to thwart threat to 440 MHz ham band  
Resent-Message-ID: <"TMZ8y2.0.Uu6.7meMr"@mx2>  
Resent-From: areswwa-list@eskimo.com  
X-Mailing-List: <areswwa-list@eskimo.com> archive/latest/30  
X-Loop: areswwa-list@eskimo.com  
Precedence: list  
Resent-Sender: areswwa-list-request@eskimo.com

In case you haven't heard, there is a threat to the 440 MHz ham bands.

A good collection of links on the subject can be found at  
the K7PP Repeater site at  
<http://www.halcyon.com/wb7vfv/newsdesk.html>.

Deadline for comments is June 1, 1998. It is not  
clear whether electronic comments will be accepted,  
so you might consider allowing some time for paper  
mail to reach the FCC in DC.

Letters to the FCC will help thwart this attempted  
takeover.

--Bruce Miller  
Public Information Coordinator  
Western Washington Section  
American Radio Relay League

Following is from Newsline:

-----  
Write a letter to the FCC  
Refer to RM-9267  
From Newsline 1082 released 5/8/98  
**LMCC DEMANDS 70 CM HAM BAND FOR COMMERCIAL USE**

The Land Mobile Communications Council has issued a demand to  
the FCC that it immediately reallocate of most of the 70 centimeter  
Amateur band over to private mobile operations with private land.  
Technically the document is nothing more than a formal rule  
making request to the FCC that has been designated RM 9267.

In reality it is more a demand by the LMCC for the FCC to immediately  
reallocate 420 to 430 MHz and 440 to 450 MHz away  
from the federal government and over to the Private Mobile Radio  
Service on a primary basis.

The Land Mobile Communications Council is also asking for news

allocations at 1390 to 1400 MHz, 1427-1432 MHz, and 1670 to 1675 MHz.

It is also demanding a whopping 85 MHz at 960 to 1215 MHz and it wants all of this turned over to the Private Mobile Radio Service no later than 2010.

But LMCC is not willing to wait until 2010 to take over the 70 centimeter band even though this is the second most popular of the Amateur radio services' VHF and UHF allocations.

Amateur Radio is a secondary user of 420 to 450 MHz. There are thousands of F-M repeaters operating from 440 to 450 MHz and a variety of modes on the air every day in the 420 to 430 MHz segment. While the Land Mobile Communications Council petition indicates that it is willing to permit Amateur Radio to retain some sort of secondary status, this would be only on a non-interfering basis with the new commercial interests.

Experts say that the best way to kill RM 9267 is through a massive letter writing campaign to the FCC. A campaign that outlines the specific use of the band by Amateur Radio Interests informational filings that detail how every hertz of 420 to 430 and 440 to 450 MHz is utilized on a day to day basis by hams. The commentary cutoff date on RM 9267 is June 1st. This leaves precious little time for radio amateurs around the nation to react. Those responding must be certain to reference RM 9267 at the top of your letter. Send comments to the Secretary, FCC, Washington DC, 20554.

Again, that June 1st as the commentary cutoff date on RM 9267. Comments go to the Secretary, FCC, Washington DC, 20554.

DOCKET FILE COPY ORIGINAL

May 20, 1998

Federal Communications Commission  
Secretary of the FCC, Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

RECEIVED  
MAY 20 1998  
FEDERAL COMMUNICATIONS COMMISSION

RE: RM-9267

Dear Commission:

As a licensed Amateur Radio operator (N7LF) I want to go on record as being *strongly* against the Land Mobile Communications Council petition under consideration. I am active on many Amateur Radio frequencies that promote the public welfare through emergency, disaster and public service communications in Northwestern Oregon. This petition directly affects my amateur activities.

Our radio system consists of eight 440 MHz repeaters and associated 420 MHz link transmitters. We also use portable 440 MHz repeaters to improve portable radio coverage. During the 1996 Portland floods, this radio system and many others, played a major role in public safety communications. Because of this, I was invited to attend President Clinton's Waterfront Park speech.

The frequencies bands 420 MHz to 430 MHz and 440 MHz to 450 MHz, proposed for reallocation by this petition, are very important to our continued success in serving the public through our work. These frequency band segments include important linking, control, amateur television and repeater systems that are used daily by a large number of amateurs. Sharing of these frequencies on a secondary status with a commercial service will not work. Amateur Radio has proven to be a successful secondary user to the government radiolocation operations on these frequency bands. RM-9267 contains no technical solutions to prove that Amateur Radio users could continue to use these bands without serious interference, if land mobile communications become the primary user. The petition proposes NO SPECTRUM REPLACEMENT.

The implementation of RM-9267 will mean the loss of 49% of the Amateur spectrum between 30 and 900 MHz. We have already lost spectrum in the 220 MHz and microwave bands. Please do not remove this spectrum from the Amateur Radio Service.

I have been licensed for 20 years and I personally use many different frequencies within these sub bands on a DAILY BASIS. The Amateur Radio Service has been the starting point for numerous "wireless carriers". The Amateur Radio Service uses a very small sliver of United States frequency allocations between 3 KHz and 300 GHz.

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List A B C D E

RM-9267 Comments

Page 2 of 2

Commission approval of any PMRS allocation on this or any amateur frequency band will effectively terminate any Amateur Radio operations within the specified band. Amateur Radio operations in Oregon are a vital communications resource to the public during emergencies and disasters.

I urge the Commission to DENY the RM-9267 Land Mobile Communications Council petition under consideration.

Sincerely,



Joel Harrington - N7LF



# COMMERCIAL COMMUNICATIONS, LLC

5211 Hwy 42

Hattiesburg, Mississippi 39401

(601)584-6396 or (601)584-9026 • Fax (601)583-4455



MOTOROLA  
Authorized Two-Way  
Radio Dealer

May 22, 1998

Ms. Margie Roman Salas  
Secretary, FCC  
Room 222  
1919 M Street, NW  
Washington, DC 20554

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MAY 27 1998

FCC ROOM

SUBJECT: LMCC Petition for Rulemaking (RM-9267)

To the Commission,

I am writing this letter in support of the above referenced petition filed by the LMCC. I also would like to thank the Commission for their timely response to this petition in that it was quickly placed on public notice. It is unfortunate, though, that while my business is completely dependent upon the private wireless radio business and my business also holds several FCC licenses in the PLMRS, I would not have been aware of this petition had I not been a member of the Industrial Telecommunications Association, Inc., which keeps me informed of FCC proceedings which may have an impact on my business and my customers radio systems. Most Federal public notices are public only in or near the legal circle adjacent to the DC beltway.

I am sure that by now you are aware that my interest in this proceeding centers around my two-way radio business and the some 600 accounts we service in a 15 county area in South Central Mississippi. Commercial Communications, LLC is a Motorola Two-way Radio and Paging Dealer and an authorized Motorola Service Station with two members and eight employees. We are a veteran controlled small business with approximately \$1M in annual revenues and although small, generate a significant amount of Federal, State, and local taxes and impact our local economy with purchase of goods and services. We provide two-way radios, pagers, associated infrastrucure, and service to many Federal, State and Local government agencies and numerous businesses in the private sector. These radio systems are licensed to the individual agencies and businesses and are used exclusively for internal communications, a very vital, even critical part of their day to day operations. We also provide non-commercial (FB6) "private carrier" shared UHF repeater systems to eligibles.

No. of Copies rec'd \_\_\_\_\_  
List A B C D E

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The lack of spectrum in the PLMRS has had a significant impact on our business and the quality of wireless communications provided to our customers in that congestion caused by short spacing reuse and co-channel licensing has caused some existing users and some would be users to seek alternatives in the CMRS, when in fact their first choice would have been a private push to talk two-way radio system providing instant communications.

The alternatives in the CMRS such as Cellular, SMR, and PCS are, unfortunately, engineered and constructed, to maximize income, and not necessarily to meet the needs of the private wireless users. These CMRS systems are built to serve dense population centers and major travel corridors, not the environs of a virtual all metal pulp mill or manufacturing physical plant nor the concrete and steel structure of a multi-story hospital or university complex, nor the rural backroads of Mississippi being patrolled by that solitary deputy sheriff whose life is sometimes dependent on push to talk instant communications provided by a quality county wide PLMRS VHF FB2 system, nor that small town volunteer fire department whose response time is very dependent on that paging system that provides them with instant notification of the fire call.

It is the responsibility of the FCC to continue to provide, to the eligibles in the PLMRS, an avenue for quality push to talk, instant communications. This avenue, even with some of the refarmed frequencies available, still remains a very narrow path that can only be widened with an increase in the amount of spectrum available to the PLMRS. It is also extremely critical to the PLMRS and the nationwide two-way radio and paging industry which has been the pseudo-enforcement agency of the Part 90 rules for the past 15 years, which is 100% dependent on the continued availability of spectrum at a reasonable licensing fee, not at auction to the highest bidder, that additional spectrum be made available as soon as reasonably possible.

I have, on occasion, had the opportunity to speak with various FCC personnel in the Rulemaking Division and the Wireless Bureau, all whom have been very courteous and helpful. Mr. Ira Keltz has been extremely helpful to me in regards to the refarming issues I have been faced with. I thank the Commission for making the FCC more accessible, especially for the consumer assistance toll free number.

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MAY 27 1998

I certainly hope that this letter has been read and considered in the course of your deliberation on this rulemaking procedure and appreciate the opportunity to submit this individual, and surely, biased input.

With best regards,



David Bowles  
Owner/Member

RECEIVED

MAY 27 2008

FCC - 11 ROOM

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. Instead, I ask that the Commission change the Amateur allocation from secondary to co-primary with the U.S. government. Prior to the Cold War era, the Amateur Radio Service was a primary status user of these frequencies. With the tremendous success of the modern "no code" Technician license and the high growth of Amateur UHF operations, now is the time to restore Amateur Radio's historic primary status within the 420-450 MHz band.

The 420-450 MHz Amateur allocation is the second most used Amateur VHF/UHF band. The LMCC has requested "sharing" this band with Amateur operations yet provides no explanation for how "sharing" might occur. Based on the history of "sharing" with commercial services (particularly the example of AVL companies "sharing" 902-928 MHz who ordered hams off the air), "sharing" means that Amateur operations will be evicted from the band. This is what happens when commercial, for profit services "share" with not-for-profit, community service oriented Amateur Radio operations.

Amateur Radio has and will continue to share its VHF/UHF allocations with *mutually compatible* services and operations. These have included, the U.S. government, the U.S. military, NOAA doppler wind shear radar and other government radiolocation services. Amateur Radio has a long and proud history of supporting the U.S. armed forces and NOAA through the National Weather Service's SkyWarn system. For these reasons, there is a *mutual interest in sharing between compatible services* like Amateur Radio and the U.S. government. However, there are *no mutual interests* in common with for-profit private