

5/23/98

Hams have always supported and respected spectrum reutilization and priority. The current 420-430 MHz restriction in northern tier states, the co-use of frequencies with government agencies in the 420-450 MHz band, and the previous loss of the 220-222 MHz spectrum have shown hams to be responsible and respectful of this valuable national resource. However, dividing up the 430-450 MHz band between the US Government, the LMCC interests, and the amateur radio service will virtually destroy ham utilization and cause thousands of hams to relinquish their 440 MHz gear on the open market. This would cause a great many of these now unwanted and inexpensive radios to flow into unlicensed hands. The negative effects would be felt for years to come.

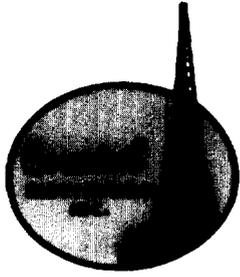
I strongly urge the Commission to study other spectrum options for the LMCC proposal. Although prohibitively expensive for hams, trunking systems and spread spectrum technology should meet the needs of the ever expanding pool of land mobile radio users in existing spectrum allocations. Remember, American amateur radio operators expend their own money to build a radio support infrastructure for the public interest. As with national parks and other protected lands, don't allow big business to roll over this small piece of public property.



Steven F. Schlembach, KF4NNQ

709 Hill Street

Robins AFB, GA 31098-1143



DOCKET FILE COPY ORIGINAL

Coastal Electronics, Inc.

Radio Communications - Cellular - Sales & Service

4527 Hwy. 17 South
P.O. Box 12007

New Bern, N.C.
28561

919-637-3167
800-688-4910
Fax. (919) 637-5

RECEIVED
MAY 29 1998

FCC MAIL ROOM

May 26, 1998

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

Subject: LMCC Petition for Rulemaking (RM-9267)

Dear Ms. Roman Salas:

Coastal Electronics, Inc. would like to offer our support of the Petition for Rulemaking filed by the LMCC seeking new spectrum for private wireless users. We are grateful that the FCC has agreed to place this petition on public notice.

Coastal Electronics is a sales and service company located on the eastern part of North Carolina. We service customers in 32 counties of our state. All of our service area is located in the hurricane zone. Therefore, our customers, as well as people in the area that are not at present using wireless devices, have a specific need for wireless devices to assist them in their business activity as well as providing communications to their employees during times of disaster.

Many potential and present users of wireless communications are being denied the opportunity to improve their Communications Networks because of the lack of frequencies available to them in all bands. We have had a loss of customer base as well as profit because of this void. We have nothing to offer some of these people. We feel that many customers have been restricted in their trade by this lack of frequencies and, therefore, perhaps have jeopardized the safety of their employees.

During natural disasters, such as hurricanes, PCS and cellular does not offer the coverage, reliability or immediate accessibility that the wireless communications industry can. There are many situations in our area that private business leaders have joined public safety agencies to assist in life saving through the use of the private radio systems as a helper to the public. Utility companies depend heavily on the wireless radio system to provide their service to the public. Cellular and PCS systems will not solve these needs.

Coastal Electronics, Inc. Locations

313 Old Dairy Road
Wilmington, N.C. 28405
(910) 791-4646
1-800-242-7507
Fax. (910) 791-6937

1203 W. Grantham
P.O. Box 1861
Goldsboro, N.C. 27533
(919) 735-4086
1-800-670-0555
Fax. (919) 734-2491

506 W. 13th Street
P.O. Box 2667
Greenville, N.C. 27834
(919) 758-4264
1-800-338-3591
Fax. (919) 758-1969

GOOD SERVICE ALWAYS COSTS LESS!

We ask that the FCC address these issues quickly as we are experiencing more and more problems associated with the lack of spectrum. We can only think it will get more crowded and conditions will worsen.

Yours Very Truly,



Evelyn C. Haire
President

RECEIVED

MAY 29 1998

FCC MAIL ROOM

ECH/ah

cc: Congressman Walter B. Jones, Jr.
Congresswoman Eva Clayton
Congressman Mike McIntyre
Senator Jesse Helms
Senator Lauch Faircloth

DOCKET FILE COPY ORIGINAL
RECEIVED

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

MAY 29 1998

FCC MAIL ROOM

Dear Sir or Madame,

I wish to protest the proposal put forth by the LMCC to re-allocate 420 to 430 Mhz and 440 to 450 Mhz to the Land Mobile service. This is a poorly thought out proposal put forth by a group who is either unwilling or unable to acquire spectrum from the FCC in the manner which has recently been established. Apparently, even though the LMCC's members are all for-profit operations, they are unwilling to bid for spectrum at auction. This alone should kill the proposal.

I am the Deputy Emergency Coordinator and Deputy R.A.C.E.S. Officer for Wayne County, Michigan with a population of over two million. In this area we have already lost the 420 to 430 Mhz portion of the band due to the agreement with Canada. The 440 to 450 Mhz portion of the band is critical to our operations here in support of Emergency Management. We use 70cm repeaters to facilitate our command and control operations while 2 meters and 1 1/4 meters are busy with tactical and net operations. We have conducted extensive planning and practical exercises here involving our nuclear plant and our airport, and the need for 440 Mhz operations has been well proven.

The proposal mentioned the possibility of amateurs sharing the band on a secondary basis, but offered no plan for how this would be accomplished. In the event of an emergency, we need immediate access to the band and this would be simply impossible under the LMCC's proposal. Even on a day to day basis, the amateur use of the 440 to 450 Mhz band is far too heavy to be expected to be secondary to the Land Mobile folks. Amateur operators have millions of dollars tied up in equipment that operates on this band and use it on a regular basis. To have this equipment become useless would certainly have an adverse effect on emergency response in the U.S., possible ripple effects on the economy, and be detrimental to amateur radio in general.

I personally own a 440 repeater, help to maintain 2 others, and utilize several 440 frequencies for linking and control. I also regularly utilize 440 simplex frequencies for point to point communications. The amateur uses of the

Noted
OCT

RECEIVED

MAY 29 1998

70cm band are varied, with amateur television, packet radio, and experimentation being just a few outside of voice operations. These types of operations are not easily moved or shared with commercial interests.

FCC MAIL ROOM

I ask you to send RM 9267 back to the people at LMCC and advise them to bid for available spectrum at the next auction, like other commercial interests have done for years now. The federal allocation at 420-430 and 440-450 Mhz, with the amateurs using this on a secondary basis, has for too many national interests at stake to be given away to the taxi cabs and tow trucks who utilize the LMCC's members.

Sincerely,



Daniel Hancock N8DJP
Deputy E.C. and Deputy R.O.
Wayne County Michigan
2630 Cornell
Dearborn, MI 48124

May 26, 1998

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

RECEIVED

MAY 29 1998

FCC MAIL ROOM

DOCKET FILE COPY ORIGINAL

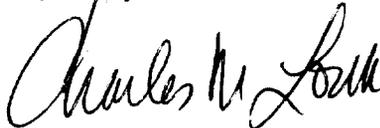
Comments on RM 9267

As an amateur radio operator active on the frequencies discussed in this rulemaking, I would like to note the following:

1. The Land Mobile Communications Council proposes secondary status for Amateur Radio on these frequencies, but no detail on the precise methods and procedures for sharing have been presented. Without such detail, and information on the volume of traffic intended for these frequencies, the proposed secondary status for Amateur Radio is only an appearance of compromise and cooperation, and has no basis in good engineering practice.
2. These frequencies are heavily used, at least in the area I live in. I have organized and participated in many public service communications events using repeaters and simplex channels in this area of New Jersey. I have especially use these frequencies to prevent additional overcrowding on the Amateur Radio two meter band during peak traffic hours, which is usually when public service activities take place.
3. The widespread availability of equipment for the Amateur 70 centimeter band has been due in part to the long term stability of this allocation. Amateur equipment for the higher frequency is generally not as available, and it is not an option to move to the two meter or lower bands due to overcrowding.
4. The LMCC has also noted in its petition that it could use higher frequencies, but these frequencies would be used several years from now. Communications technology is now mature for these higher frequencies, and there is no need for the LMCC to wait to use these higher frequencies if they can be reallocated.

I ask the Commission and its staff to consider these points, and to deny the Land Mobile Communications Council's petition for primary status in the 420-430 Mhz and 440-450 Mhz bands.

Respectfully submitted,



Charles M. Losik
334 Green Grove Road
Wayside NJ 07712

of the rec'd
DOE

2

OST



Ft. Walton Communications, Inc.

660 LOVEJOY RD P. O. BOX 237 • FT. WALTON BEACH, FLA. 32548 • PHONE 243 7621

RECEIVED

DOCKET FILE COPY ORIGINAL

MAY 29 1998

22 May 1998

FCC MAIL ROOM

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

Re: LMCC Petition for Rulemaking (RM-9267)

Dear Ms Salas:

I would like to take this opportunity to thank the FCC for its placing this petition on public notice in a timely manner. Please accept this letter as my support of the Petition for Rule Making filed by the LMCC seeking new spectrum allocations for private wireless users.

My company is a private two-way radio dealer and service facility located in Ft. Walton Beach, Florida. I have been in business for 31 years and employ 16 people in the communications industry. We both sell and utilize two-way radios and consider this use very beneficial to our customers and the local economy because most communications requirements are of a local geographic nature.

The lack of private wireless spectrum in the 150mhz, 450mhz, 800mhz, and 900 Mhz bands has adversely affected our ability to meet the needs of our customers. We have been forced to turn business away due to not being able to provide systems which meet their requirements. Many users are in need of communications systems for employee safety concerns and are forced to do without since they are unable to afford cellular and other systems due to high recurring costs.

The majority of my customers are small businesses requiring local geographic area coverages. These requirements cannot be met by commercial systems such as cellular and PCS due to the fact that their coverage patterns are designed to cover metropolitan areas while ignoring rural areas. These needs can only be satisfied by using the private wireless spectrum.

I wish to urge the FCC to address these issues as quickly as possible since problems associated with the lack of spectrum are increasing.

Regards

Ft. Walton Communications, Inc.

William E. Delp
Pres.

No. of Copies rec'd 0+1
CODE 0ET



STI MOBILE COMMUNICATIONS

a division of ACADEMY COMMUNICATIONS ENTERPRISES, INC.

DOCKET FILE COPY ORIGINAL

2390 South Kalamath, #D
Denver, Colorado 80223

Phone: (303) 936-7100

Fax: (303) 936-7701

May 26, 1998

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

Subject: LMCC Petition for Rule Making (RM-9267)

STI Mobile Communications fully supports the Petition for Rule Making filed by the LMCC seeking new spectrum allocations for private wireless users. We commend the FCC for their prompt action in placing this petition on public notice.

STI Mobile Communications is a wireless systems and equipment provider operating in the Denver Colorado area for over 30 years. Our company employs approximately 22 people. The majority of our customers are wireless radio system users from the Public Safety and Private Business Sector. These users rely heavily on their wireless systems for both routine business and communications directly related to the safety of life and property.

In the Metropolitan Denver area, the availability of spectrum for use by non-commercial interests has become almost non-existent. Our business and the communications needs of our customers have been seriously affected by the lack of radio frequencies available to new users and the expansion of existing wireless users systems.

The FCC has questioned why all wireless users cannot obtain their communications from commercial service providers (ie. Cellular, PCS, Nextel etc.). These entities do not provide the type of service and areas of coverage that are required by most Business and Public Safety wireless users for their internal communications needs.

We urge the FCC to act promptly on these issues which affect the safety of countless individuals who rely on fast efficient communications on a daily basis in the performance of their jobs.

Sincerely,


Robert B. B...
Operations Mgr.

RECEIVED
MAY 29 1998

FCC MAIL ROOM

Fccfil22



LM 9367

DOCKET FILE COPY ORIGINAL

OSSIPEE MOUNTAIN ELECTRONICS, INC.

OSSIPEE MOUNTAIN ROAD • RR 1, BOX 396 • MOULTONBORO, NH 03254
TELE: (603) 476-5581 • FAX: (603) 476-5587

RECEIVED
MAY 29 1998
FCC MAIL ROOM

May 26, 1998

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

Dear Ms. Salas:

This letter is being filed in support of the Petition for Rule Making filed by the LMCC seeking new spectrum allocations for private wireless users. We appreciate the FCC quickly placing the petition on public notice.

Our business provides sales and service of professional two-way communications equipment to various types of businesses and government entities throughout the State of New Hampshire. We have been in business for 23 years and we currently employ 13 people. We not only sell and service two-way radios we use them as an important part of our business communications.

The lack of private wireless spectrum in the 150 MHz, 450 MHz, 800 MHz, and 900 MHz bands makes it difficult to provide frequencies for our customers to operate privately owned systems on. This shortage makes it especially difficult to set up new private systems as well.

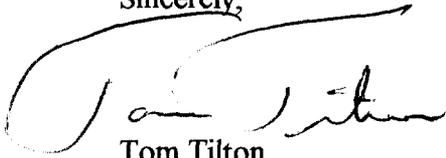
While there are alternative means of communications like cellular and PCS, they are hardly perfect systems. Cellular systems throughout New Hampshire provide spotty coverage at best until you reach a heavily populated area (mostly in the southern part of the state). It would be virtually impossible for our company and the companies we deal with to rely completely on cellular. The accessibility of cellular is not always immediate and can sometimes take several attempts to complete a successful call. As far as PCS, we have been informed that in the central and northern part of New Hampshire (where we are located) service will not be available for quite some time.

The new spectrum will have numerous benefits for not only our business but also for our customers who rely on us to provide them with communications solutions. We thank you in advance for your

of copies rec'd 

prompt attention to this matter as the problem associated with the lack of spectrum are increasing.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Tilton". The signature is fluid and cursive, with a long horizontal stroke extending to the left.

Tom Tilton
President

cc: Senator Judd Gregg
Senator Bob Smith
Congressman John Sununu

THE LUBRIZOL CORPORATION

RECEIVED

MAY 29 1998

May 27, 1998

FCC MAIL ROOM

RM 9267

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

Dear Madam:

I am filing in support of the Petition for Rule Making filed by the LMCC seeking new spectrum allocations for private wireless users. I and my company do appreciate the quick action the FCC has taken to place the petition on public notice.

The Lubrizol Corporation is a specialty chemical company which is headquartered in Wickliffe, Ohio. We have been in business for 75 years. We employ over 2000 people in Northeast Ohio. We use wireless communications for our in-house fire department, production facilities, service and maintenance groups, help desk, schedule and inventory control, man-down systems and security. We have over 700 users in our two facilities in the Cleveland area.

The initial use of wireless communications here at Lubrizol, was for security and fire department communications within the company and with the local public-safety agencies. The use of wireless communications in the 800MHz and 150Mhz bands has increased our overall productivity in our plants immensely over the past five years. This increase is directly contributable to the use of instant communications by radio. Our fire and security departments depend on these radios to help protect our facilities and people.

The use of cellular radios or PCS would be a hindrance to the way we now do business with our present radio system. We assign talk groups to individual departments or work groups, which keeps everyone in those groups aware of what is happening in their particular area of expertise. Between our two facilities we now have over eighty talk groups assigned and we are averaging over 7,000 calls a day. All talk groups have the ability to communicate with each other. This is a great advantage in case of an emergency.

Our wireless communications system continues to grow yearly. We see in the future the need for additional frequency spectrum. Cellular and PCS will NOT provide us with the robust performance of the system we now have in place.

Sincerely,



Alan E. Schmidt
Project Manager



Thomas Scott
Security Systems Administrator



John Curtis Amateur Radio KC6QGK
149 Rivo Alto Canal
Long Beach, CA 90803

R/M-9267
DOCKET FILE COPY ORIGINAL

To:
Secretary-Federal Communications Commission
Washington, D.C. 20554

RECEIVED
MAY 29 1998
FCC MAIL ROOM

5/25/98

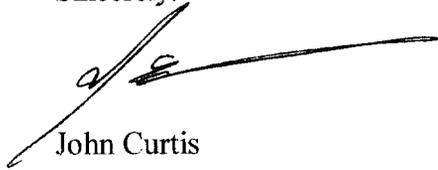
Re: 70 cm Amateur band revocation attempt by LMCC.

Comments as Follows.

As an amateur radio operator on the 70 cm. Band, I wish to oppose the attempt, by the LMCC, to take over or revoke the above mentioned band. As you are aware. it is essential to facilitate emergency communications as well as multiple modes of normal amateur operations. I find the attempted take over unfounded and unwarranted. If this were to occur. it would be used for monetary gain and not as a service.

While I realize the radio-frequency spectrum is becoming limited due to crowding. there are better ways to equip those commercial agencies than to destroy the amateur radio frequency spectrum we operators have taken great time and care to establish. I ask your consideration as well as that of the Commission to help protect our spectrum.

Sincerely,



John Curtis

0

RECEIVED

MAY 29 1998

FCC MAIL ROOM

John Santillo N2HMM
7 Forest Drive
Highland Lakes, NJ 07422

May 27, 1998

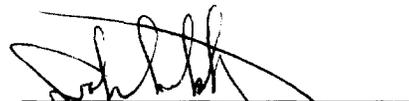
RM-9267
Secretary
Federal Communications Commission
1919 M St., NW
Washington, DC 20554

Secretary,

Currently I am the trustee and Control Operator of the 449.075 repeater. One thousand dollars of the cost of this repeater was out of my pocket with an additional seven hundred and fifty dollars coming from club dues and the Vernon Township Police Department. The Amateur Radio Operators of Sussex County, northwest NJ use this repeater not only for the purposes of general communications but also for the purposes of handling voice traffic in the event of an emergency declared by the Chief of Police of Vernon Township. This repeater is also used to track severe weather when the National Weather Service activates SKYWARN. Information passed during SKYWARN Nets is forwarded directly to the Sussex County Office of Emergency Management and local media outlets such as WSUS, the county's local FM Broadcast Station. In addition, the control link at 441.8MHz used to control the repeater would also be impacted by RM-9267.

The monetary impact as well as the repercussions to the community would be profound if RM-9267 was approved. Please consider this when making your discussion.

Respectfully,


John Santillo N2HMM

0
08T

DOCKET FILE COPY ORIGINAL
May 27, 1998

Secretary
Federal Communications Commission
Washington DC 20554

Ref: RM9267

Dear Secretary;

I am concerned about RM9267 and its potential affect on the 70 centimeter Amateur band. For about 30 years I have used this band for civic purposes such as phone patch for road emergencies, Operation Sky-Warn, marathons, walk-a-thons and other community related programs. I believe that the Land Mobile Communications Council could more appropriately use some other frequency spectrum, or, perhaps reallocate portions of the bands they now have for digital services with modulation schemes like CDMA. These new methods have allowed the wireless companies to increase cellular traffic without requiring additional bandwidth.

As an engineer working in the RF field, I am confident that the request (RM9267) made by the Land Mobile Communications Council is one made with expedience and profit in mind and not the most efficient use of available spectrum or civic need.

Amateur Radio provides a valuable service to communities nationwide and our 70 cm band is a very big part of our ability to provide that service. I feel very strongly about the need to preserve the 70 cm Amateur band.

Sincerely,



James R. Greene, WB2NIB
1 Oakridge Drive
New Windsor, NY 12553

Cc: Alfonse D'Amato
Daniel Moynihan

RECEIVED
MAY 29 1998
FCC MAIL ROOM

File copy rec'd
MAY 29 1998



RECEIVED

MAY 29 1998

FCC MAIL ROOM

ROBERT SPEER

ATTORNEY AND COUNSELOR AT LAW

104 SPRINGFIELD CENTER DRIVE

SUITE 109

WOODSTOCK, GEORGIA 30188

(770) 517-0017

DOCKET FILE COPY ORIGINAL

ATLANTA OFFICE:

750 HAMMOND DRIVE
BUILDING 9, SUITE 107
ATLANTA, GEORGIA 30328

FAX: (770) 924-4192

EMAIL: SPEERLAW@SPEERLAW.COM

URL: HTTP://WWW.SPEERLAW.COM

May 19, 1998

Secretary (RM-9267)
FEDERAL COMMUNICATIONS COMMISSION
1919 M ST NW
WASHINGTON DC 20036-3507

RE: My Opposition to Reallocation of 70 cm Band (420 to 450 MHz)

Ladies and/or Gentlemen:

I was recently made aware of the petition by the Land Mobile Communications Council (LMCC) to reallocate the 70 cm band (420 to 450 MHz). Please be advised that I vigorously oppose this petition. The metro Atlanta area has recently undergone horrible tornado damage. The 70 cm band was instrumental in the ability of amateur radio operators to assist in the aid of those citizens who were in distress. At the time of the tornado crisis in this area, the 2 meter band was crowded and many amateur operators then began to communicate on the 70 cm band. Not only that, the 70 cm band is used in this area very frequently, on a daily basis, by amateur operators to report traffic problems and other occurrences of vital important to the public. I *oppose* the petition by the LMCC, because the best interests of the public would not be served by granting it.

Kindest Regards,

SPEER LAW OFFICES



Robert Speer (KF4VIK)

RHS:sds

EMAIL: SPEERLAW@SPEERLAW.COM
URL: HTTP://WWW.SPEERLAW.COM

ROBERT SPEER
ATTORNEY AND COUNSELOR AT LAW

750 HAMMOND DRIVE
BUILDING 9, SUITE 107
ATLANTA, GEORGIA 30328
(404) 255-1445

104 SPRINGFIELD CENTER DRIVE
SUITE 109
WOODSTOCK, GEORGIA 30188
(770) 517-0017

No. of Copies rec'd 0
CLASS CODE

DOCKET FILE COPY ORIGINAL

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

RECEIVED

MAY 29 1998

FCC MAIL ROOM

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 land mobile

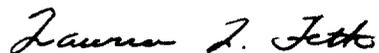
0
 OCT

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.

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,



Lawrence L. Feth, K8HTC
1143 Forest Rise Drive
Westerville, OH 43081-3205

May 26, 1998

Rm-9267

DOCKET FILE COPY ORIGINAL

May 25, 1997

RECEIVED

MAY 29 1998

FCC MAIL ROOM

Leonard Halbert
Evelyn Halbert
3104 Topeka Street
Riverbank, Calif. 95367

Office of the Secretary
Federal Communications Commission
Room 222
1919 M Street NW
Washington, DC 20554

Dear Sir,

We are writing this letter in reference to RM-9267. We recently learned about the petition filed by the Land Mobile Communications Council that asks to reallocate the frequency bands 420-430 and 440-450.

As licensed radio amateurs and as members of Amateur Radio Emergency Services in our area, we urge you not to make this change. We feel that the loss of access to this band would affect the ability of radio amateurs to provide public services such as emergency communications during disasters. We also use the 440 repeater to reach outlying areas and for crossbanding.

There are many of us who have dual band radios which run 2 meter and the 440 band and antennas. We use 440 when the 2 meter becomes congested. These radios and equipment lose their value if we have no access to 440.

Thank you.

Sincerely,

Leonard Halbert KF6LBZ
Evelyn Halbert KF6KXW

Leonard Halbert KF6LBZ
Evelyn Halbert KF6KXW

SEARCHED _____
SERIALIZED _____
INDEXED _____
FILED _____
OCT 0

RECEIVED

MAY 29 1998

DOCKET FILE COPY ORIGINAL

I oppose the ~~MAIL ROOM~~ for rule making RM - 9267.

7

Robert W. Mason

ROBERT W MASON

P.O. BOX 61

FAXON, OK 73540

RCSLSX

of Copies rec'd
CODE

0

FCC MAIL ROOM
MAY 29 1998
RECEIVED

DOCKET FILE COPY ORIGINAL

I oppose the petition for rule making RM - 9267.

Norman P Miller

P.O. Box 571

FT. COBB, OK

73038-0571

KC 5 SHP

Number of Copies rec'd 0
DATE

Michael H. Haefner

116 N. Timberline
Colleyville, Texas 76034

POCKET FILE COPY ORIGINAL RECEIVED

MAY 29 1998

FCC MAIL ROOM

May 26, 1998

Ref: RM 9267

Secretary, FCC
Washington, DC 20554

Dear Sir:

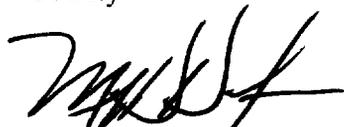
As I look at the vast spectrum allocated for radio use, I see only very small dots designated for Amateur Radio use. As I understand RM 9267, The Land Mobile Communications Council requests the reallocation of a significant portion of one of the most popular segments used by Amateur Radio away from the government for private land mobile use.

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 who provide communications in support of public service and emergencies.

The 70cm (450 MHz) 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, and through, Austin to the Dallas/Fort Worth Metroplex, and on to West Texas. Any tampering with the allocation of these frequencies will surely jeopardize the public service that can, and has been, rendered in time of Gulf Coast hurricanes, as well as local weather watches in conjunction with the National Weather Service for the Tornado Warning System.

I would like to go on record as being very strongly opposed to tampering with the frequency allocations in the 70 cm band, and I am urging you to oppose the Land Mobile Communication Council's demand to reallocate most of this band over to private mobile operations now, or any time in the future.

I am writing this letter as a member of the Hurst Amateur Radio Club, which operates the Radio Amateur Civil Emergency service in conjunction with the City of Hurst, Texas, and Tarrant County.



Michael H. Haefner,
N5YM

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

Congresswoman Kay Grainger,
100 E 15th St., Suite 500
Fort Worth, TX 76102

of Copies rec'd
DATE

0

A.R.S. WA6SBS
LOUIS A. OGAARD, Ph.D. DUCKET FILE COPY ORIGINAL

Box 7433
Bismarck, ND 58507-7433
Ph. 701-328-4096
E-mail: MSMAIL.lao@oracle.psc.state.nd.us

May 27, 1998

Secretary Magalie Roman Salas
Federal Communications Commission
Room 222
1919 M Street NW
Washington, D.C. 20554

Dear Secretary Salas:

I am writing in regard to RM 9267, the proposed rule making where Land Mobile would appropriate the Amateur 420 - 450 Mhz band.

I wish to strongly oppose this action. The Amateur 440 band has been a very popular band to the amateur community and also a very important service to the public in general.

I have been a licensed amateur radio operator since 1961. This is the first time I have had occasion to voice my opposition to an action by the FCC. I was licensed before incentive licensing took effect, and yet I was forced to pass the Extra to regain privileges I already had been granted. I did not complain but instead took the required tests.

However, the surreptitious means by which this action on the 440 band may be taken has left me in a state of outrage. This rule making was not posted on the FCC web site, indicating a deliberate attempt to conceal action from the amateur radio community which currently uses this band.

I hope that you will do everything in your power to help the Amateur Radio Service retain the 420-450 Mhz spectrum keeping in mind not only the investment the Amateur Community has in it already but also the public service the Amateur Community offers in times of need.

Sincerely,



Louis A. Ogaard, Ph.D.
WA6SBS

File of Copies rec'd
JBE



Yoplin Amateur Radio Club
 P.O. Box 2983
 Yoplin Mo. 64803
 May 24, 1998

RM 9267
 secretary
 Federal Communications Commission
 1919 M. ST NW
 Washington DC. 20554

Dear Sir:

On behalf of the Yoplin Amateur Radio Club I would like to state that we are very much against RM 9267 in as much as it applies to the 440 MHz Amateur Radio Band. This is because this band is used heavily in Southeast Pa and Southwest Mo. It is one of the most useful bands for Amateur television, packet radio, weaksignal CW and for satellites. More importantly there are clubs throughout the United States that have spent large amounts of money on repeaters and these repeaters are always available for use in any emergency at no cost. They have proven invaluable for weather spotting and other emergencies. It would seem like an unjust taking of property if the right to use them were taken away.

yours truly

Mark E. M. L. L. L.

RECEIVED

JUL 29 1996

FEDERAL COMMUNICATIONS COMMISSION

Lee DeForest Radio Club of Hemet
250 "E" South Lyon Avenue - Suite 411
Hemet, CA 92543

SECRET FILE COPY ORIGINAL

Before the

FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

In the Matter of

Proposed Reallocation of
420 to 430 MHz from the Federal
Government to the Private
Mobile Radio Service

Sirs,

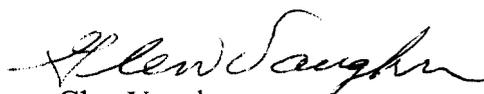
I am the president of the Lee DeForest Amateur Radio Club, located in the San Jacinto Valley in Southern California. We are a group made up of about one hundred members.

This comment is on RM 9267, concerning the request of the LMCC proposal to take over or share (secondary to the military and to them) the 420-430/440-450 MHz bands. This is against the best interest of amateur radio and the general public. I understand that the PMRS community is a good service organization and that their frequency needs are growing, but the taking or reducing of these amateur bands is not the answer.

While the amateur community certainly use these frequencies for their own use and have gone to considerable expense in buying their equipment, the most important use of these frequencies is in the service we provide in time of disasters. Often we are the only possible early communication as I am sure that you are aware. The 70cm band is not only very popular among radio amateurs, but it plays a critical roll in emergencies. We use the 440 band to communicate with Riverside County RACES coordinating groups. ARES and local emergency services all include these frequencies as an integral part of their emergency communication plans.

We believe that we are a good sharer of these bands with the government, but believe strongly that being second to LMCC will greatly hinder our public service in time of emergencies. Sharing is not very practical with LMCC.

Thank you for your consideration


Glen Vaughn
President of Lee DeForest ARC.

11 of Copies rec'd 0
CODE

979 Almond Drive
Oakley, CA 94561
donlyles@ecis.com
May 23, 1998

RECEIVED
MAY 29 1998

RM9267
FCC
Washington D.C. 20554

FCC MAIL ROOM

DOCKET FILE COPY ORIGINAL

Secretary:

I would like to place my comment regarding RM9267 changing part of the 420-450 MHz band from Amateur to Commercial.

In 1970 when I first seriously began transmitting, anything above 30 MHz was considered foolish. After I raised my children and began to transmit again in 1991, 2 metres was considered the norm. Amateur radio made this VHF move possible. They built the first repeaters etc.

The 70-cm band, the one we are making comment on, was the place I could ask questions about technical information that helped me move from Technician to Extra in just a couple of years. I did this while commuting to work. There are many repeaters and lots of wide-open spaces to ask questions with polite people to answer these questions in our area of the USA.

I enjoy ATV (Amateur Television) on 425.5 MHz, which is as you know, cable channel 59. We are also trying to move satellite communication to the 70-cm band. Both of these would be seriously curtailed, if not eliminated if the 70-cm band is sliced up. This is also an excellent jumping off spot for Earth-Moon-Earth bounce. The size of the antennas and relatively inexpensive equipment make this band an ideal first step for EME. In big emergencies there are dozens of simplex conversations up on 440, trying to work out kinks while 2 metre repeaters work on organization.

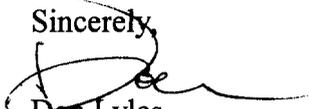
Amateurs have helped build the radio system into what it is today. We continue to work on spread spectrum and digital voice as the FCC will allow. 420 - 450 MHz is an ideal place to play and experiment with these modes.

It is my guess that between one-fourth and one-half million HAM's have receivers and/or transmitters on the band in mention. This is a tremendous amount of money, spent on equipment. We have no way to fight big money that is why we rely on the FCC to keep our band allocation free and open.

As a baby-boomer moving past 50, I use and appreciate the clear, clean, unpolluted UHF band to hear my friends and move radio to a new level. Please reject the Land Mobile communications Council request to change this band.

As a last thought, why not give them lower 30 MHz of 1240-1300 MHz band. Amateur equipment is non-available and it will be years before the HAM community uses all 60 MHz of this 23-cm band.

Sincerely,


Don Lyles
AC6ZZ

of Copies rec'd 0
CODE 09T