

DOCKET FILE COPY ORIGINAL

Federal Communications Commission
Secretary of the FCC
Washington, D.C. 20554

Ref: RM-9267

Dear Commission:

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

I am active on many Amateur Radio frequencies that promote the public welfare through emergency, disaster and public service communications. The frequencies stated in RM-9267, (420 MHz to 430 MHz and 440 MHz to 450 MHz) 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 in Southern California.

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 prove 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 if RM-9267 is not approved.

Sincerely,

Rosina D Smith

KC6DGM

P.S. These frequencies are among those used by our Red Cross disaster volunteers to facilitate disaster relief efforts. We need all the help we can get to maintain clear communications and coordinate Red Cross activities.

R Smith

cc'd to rec'd

1/12

FROM:

Name, Callsign:

Delmar L. Bish KC5HHB

Address:

RT#2 Box 93

RECEIVED

City, St, Zip

Vici, OKla 73859

MAY 29 1998

FCC MAIL ROOM

Secretary, FCC,
Washington DC, 20554

Subject: RM 9267

I protest RM 9267 to reallocate the frequencies that we use in storm spotting for the National Weather Service here in Oklahoma. This would mean that direct link for Storm Spotting would be lost between our Spotters and the National Weather Service. This would effect the early warning abilities for Tornados and Severe Weather as it moves through our communities and Towns.

Comments:

Here in the State of Oklahoma we use many repeaters linked from the 2 Meters to 440 MHZ to help with storm spotting. This would be impossible, to hold this link system without the ability to work the two bands together. The National Weather Service in Norman Oklahoma, some 160 miles from us, is the warning system for Severe Weather which comes through so often here in the State of Oklahoma. Here in Northwest Oklahoma is only one of the several links that is linked to Norman in the State to watch Severe Weather.

Delmar L. Bish

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MAY 29 1998

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I oppose the petition for rule making RM - 9267.

Daniel F. Burkett
KCSUR
5351 W. Oak
Lawton, OK 73505

Daniel F. Burkett

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RM-9267

TO: Federal Communications Commission

Sirs,

In my last letter to you, (also mailed today), I forgot to mention another possible problem in sharing the 440 to 449.99 MHz band with land mobile. The land mobile systems in use in the 450 MHz band already causes interference to the 440 MHz hams because they normally run very high power and are so close in frequency. I can visualize much more severe problems if we are in the same band together. I'm sure you already take these ideas into consideration when deciding on new band plans, but I didn't feel right not mentioning this in my last letter.

Thank you (again),

Bob Gudgel K7IQ

President,

Puget Sound Repeater Group 146.96 MHz

May 25th 1998

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MAY 29 1998

FCC MAIL ROOM

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MAY 29 1998

FCC MAIL ROOM

MARTIN I. & CATHY S. SHAPIRO
6340 WEST SURREY AVENUE
GLENDALE, ARIZONA 85304
AMATEUR RADIO STATIONS KA7GKN & KA7TRH

May 24, 1998

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

SUBJECT: FILE NUMBER RM-9267

To Whom It May Concern:

I am an active Amateur Radio Operator. I have just become aware of the Land Mobile Communications Council [LMCC] request for the 420-450 Mhz band [70cm]. I believe this use will be incompatible with Amateur Radio in the band.

Amateur's utilize this band for many uses, such as, linking various systems, public service and emergency communications.

Please do not consider Amateur Radio as secondary to the Private Mobile Radio Services [PRMS] or the Land Mobile Communications Council [LMCC]. Amateur Radio continues to play a very important role.

Please do not abandon Amateur Radio regarding this issue, reject RM-9267.

Sincerely, *Martin Shapiro*

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MAY 29 1998

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Reference RM-9267

Hugh W. Zeanah
11017 Mt. Charron Dr.
Huntsville Al, 35810.

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

Dear Sirs,

It has come to my attention that the LMCC is requesting re-allocation of portions of spectrum which cover the 420 to 450 Mhz band for the PMRS. I wish to register my concern and opposition to this as an amateur radio operator.

I am very concerned that any change in the primary user of the 420 to 450 Mhz band would seriously impact Amateur Radio services as the secondary user. Along with numerous other amateur radio operators in Huntsville, I am involved in all facets of public service utilizing the 440mhz band. As trained severe storm spotters, we have continued to provide vital information to the weather service through what has been a difficult transition period as the Huntsville office has been phased out. Links for both voice and digital communications with the Birmingham weather service office are now an essential part of our public safety support during severe weather events. These systems have also provided vital communications links for Red Cross personnel in the field following tornado disasters in our area. In addition, phone link systems operating in this band have provided vital communications links for search and rescue efforts in remote areas of our county not accessible by commercial cellular means.

The amateur radio community has over 20 active channels in the Huntsville and surrounding areas providing vital public services of many natures. I respectfully urge the commission to find alternatives to the re-allocation of 420-430 and 440-450 Mhz to PMRS. Thank you for your consideration and hard work.

Sincerely,

Hugh W. Zeanah
Hugh W. Zeanah

0

09T



MAY 2 9 1998

Steven D. Richardson

6308 East Broadway
Broken Arrow, OK 74014-6938

Email: sdr@contractor.net
Pager (918) 632-5543
Office Tel. (918) 357-3490
Fax (918) 357-1932

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May 25, 1998

RM-9267
Secretary, FCC
1919 M Street NW
Washington, DC
20554

Gentlemen:

This letter is written expressing my opposition to RM-9267. My opposition is expressed from the vantagepoint that, if enacted, this change will do irreparable harm to the amateur community and the public interest services, which we provide. In my own community of Broken Arrow, OK, the 440Mhz frequencies are utilized extensively in our amateur radio storm spotting and emergency management efforts. The 440Mhz frequencies are utilized in conjunction with the 2-meter frequencies, not in place of them.

For many years, the amateur community has served as a good steward of these frequencies acting in the public interest. Please do not enact RM-9267 which will gravely impair our public service efforts.

Respectfully,

Steve Richardson
Steve Richardson
Amateur Call KC5HMW

of Copies rec'd 0
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Programming	Database	Hardware
Windows	Dos	Unix
		Internet

Edward C. Weaver
Radio Amateur KC7GTZ
P.O. Box 6017
Huachuca City, AZ 85616
May 18, 1998

REC'D
MAY 20 1998
FCC

DOCKET FILE COPY ORIGINAL

Secretary, Federal Communications Commission
Washington, DC 20554

REF. RM 9267

Dear Mr Secretary:

I am told that the Land Mobile Communications Council (LMCC) has "demanded" that your Commission take most of the 70 CM band away from Radio Amateurs and reallocate it to private mobile operation. They are also "demanding" that you free up certain other frequency spreads. I believe that at least one of these (1675 MHZ) is presently used for Global Positioning System (GPS) satellites.

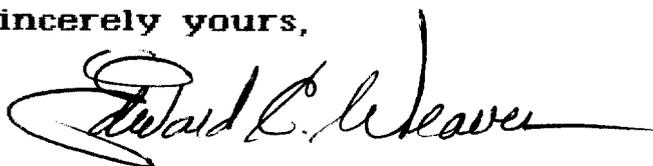
The 70 CM band is the second most popular amateur radio band. Here in Arizona we have 70 CM repeaters on at least eight mountain tops to tie the state together (the Cactus Network) and to tie Arizona to other surrounding states. Amateurs have many millions of dollars invested in equipment specifically designed for the 70 CM band. Radio manufacturers and dealers have many millions of dollars invested in inventory of this equipment. Encroachment by LMCC could make all this equipment obsolete.

We realize that the radio spectrum is limited but we depend on you at the FCC to protect all allocations from encroachment by others. To our way of thinking, it would make as much sense for the LMCC to "demand" that you reallocate all of the television UHF band to them.

When the telephone companies were faced with a proliferation of wires to carry phone calls they came up with "carriers" and other innovative ideas to make better use of what they had. Perhaps, if you can hold the line and preserve the status quo, private mobile operations can get more innovative.

If you find you must do some juggling in the bands, please include the proviso that those benefiting must compensate those, amateurs, manufacturers and dealers whose investment is made obsolete.

Sincerely yours,



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SUTTER BUTTES COMMUNICATIONS, INC.

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MAY 29 1998

FCC MAIL ROOM

May 26, 1998

445 PALORA AVENUE
 YUBA CITY, CA. 95991
 (530)673-3475 (800)300-0054
 FAX (530)673-1085

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

RE: LMCC Petition for Rulemaking (RM-9267)

Dear Ms. Magalie Roman Salas,

Sutter Buttes Communications, Inc. is filing in support of the Petition for Rulemaking filed by the LMCC which seeks new frequency spectrum allocations for private wireless communications users. We commend you on your rapid and timely action in placing this petition on public notice.

Sutter Buttes Communications, Inc. is a crucial and aggressive wireless service provider in the Northern California area. Previously a Motorola owned facility, this seven year old business is an independently owned and operated sales, service and installation communications dealer, employing eleven people. We are a licensed SMR and Private Carrier operator, in addition to the offering of conventional community repeater services. Each on our management team brings more than twenty years of communications experience to the company and have had the opportunity to grow with the wireless industry since it's infancy.

In one simple statement, our business exists only with the ability to provide services utilizing the available frequency spectrum. As you should already be aware, existing spectrum in 150 MHz, 450 MHz, 800 MHz and 900 MHz is essentially depleted and we are unable to file for authorizations in either the 800 or 900 MHz bands. Conventional frequencies are now overcrowded and the migration to Trunked use was a natural solution. However, recent years rulemaking have now made the availability to use Trunked technology all but non-existent due to the unavailability of spectrum.

The final straw, spectrum auctioning, closed the doors to private land mobile radio users. The reality is, these private land mobile users do not want what the big business spectrum holders are offering. The offerings are not directed towards providing for the needs of these normal, everyday commercial businesses. The network systems are proving to be overly expensive to use, frequently unreliable due to outages and unable to provide adequate coverage in the rural areas. The nature of these network systems means that the users are no longer afforded the ability to provide their teams with quick, efficient communications, and most importantly, safety for the users is drastically reduced because of the inability to rely on the communications in inadequately covered areas. The users are now totally reliant on the whims of these big businesses.

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MAY 29 1998

FCC MAIL ROOM

The spirit of competition has all but disappeared, for there is no competition where there

With the availability of 800 MHz and 900 MHz now gone, the re-farming of 450 MHz seemed most appropriate. Unfortunately, until required migration is mandated by the FCC, with deadline dates for action, the use of 450 MHz for more efficient, and reliable, Trunked operation will never be realized.

The blatant truth is that two-way radio dispatch users are being deprived of spectrum. The dispatch user does not need or want cellular or PCS communications to fulfill their common, everyday needs. PCS and cellular systems provide solutions for a far different need. Dispatch needs fast, reliable communications. They need both long range and short range communications. They need to communicate within their work groups, and require that the entire groups are involved in the conversation. This simple need is inherent not only within the commercial community, but within the police and fire protection agencies as well. They do not need that to happen through the public telephone switch network. What they need is simple. Give them back what they enjoyed in the past.

New spectrum, aimed at this enormous, pent up need should be given top priority. It is most distressing that while this vast need exists, the big businesses, not to mention foreign interests, continue to manipulate their auction awarded spectrum for their own interests, not the interests of the public. Something is severely wrong when our government's valuable resources are sold, and that sale is not in the best interest of our public nor is it available to our public. It is abhorrent to see the finality in these actions. It frightens me to see the foreign interests increase ownership at such a rapid rate in this auctioned spectrum. A statement that I frequently make is that war will not be necessary to protect our government, for our government is selling our very soul to these foreign interests.

Please, bring the control of spectrum back to the people. Stop the sale of spectrum, for it is a depleting and endangered resource, and one that belongs to the United States of America only. Introduce the availability of new spectrum to fulfill the needs of the people. Give us what we need, simple wireless dispatch communications. Give us back the choice to decide what we want, not what big business is willing to give us. I implore upon you to act swiftly and decisively, for, every day the demand for spectrum increases, but relief is not seen on the horizon.

Sincerely,



Randy Fitch

JOHN PASCALE
1316 WALNUT MEADOWS DRIVE
OAKLEY, CALIFORNIA 94561
925.625.9356

DOCKET FILE COPY ORIGINAL

May 26, 1998

Federal Communications Commission
1919 M Street, NW
Washington DC, 20554
Attention: Secretary, RM-9267

Re: RM-9267

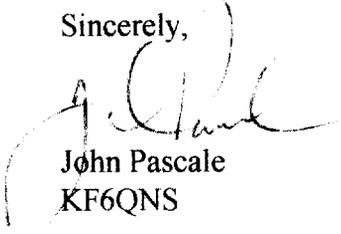
Dear Commissioners:

As a recently licensed Amateur Radio Operator, I am writing in opposition to The Land Mobile Communications Council's (LMCC) petition, wherein they wish to acquire specific radio frequencies now assigned on a secondary basis to Amateur Radio.

Although recently licensed I have been involved with Amateur Radio through friends and relatives for over twenty years. Amateur operators have been able to coexist with the Federal Government, the primary user, for many, many years with varying emission types.

The lose of these radio frequencies to the Amateur service would be a great loss not for just Hams, but also for the many civilians served by Amateur Operators who volunteer many untold hours, preparing and implementing communication skills used during natural disasters, as well as the numerous community services programs. Amateur Radio provides a great service for the taxpayers at little or no cost to the taxpayer.

Sincerely,


John Pascale
KF6QNS

JP:jp

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

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MAY 29 1998

FCC MAIL ROOM

OBJECTION TO REALLOCATION OF PRIMARY 70 CM STATUS TO PMRS

I am writing this letter to express my opposition to the Land Mobile Communications Council's (LMCC) request that primary user status of the 70 cm band be reallocated from the federal government to the Private Mobile Radio Service (PMRS). As an amateur radio operator, I enjoy the use of the 70 cm band as a secondary user, and I would like this to remain this way. I do not feel that amateur radio operators should share the frequencies described in the LMCC's request, RM 9267, with the PMRS. This "demand" in my opinion is unreasonable and I do not believe that the non profit public should always take "back seat" to the profit public. The electromagnetic spectrum is a limited "resource" and a demand for preference in usership is therefore unreasonable. I would encourage the LMCC to seek an alternative other than a widely used allocated subband to the amateur radio service.

Thank you,

David Sailer

David Sailer (KB8PQZ)
313 Hanover St.
Belding, MI 48809
(616) 794-2604

COE rec'd 2
COE
DET

DOCKET FILE COPY ORIGINAL

May 22, 1998
Post Office Box 550370
Birmingham, Al 35255.

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

FCC MAIL ROOM
MAY 29 1998
RECEIVED

RE: Response to RM—9267

Dear Sirs:

The LMCC is attempting to usurp a vital portion of one of the most popular bands now used by the Amateur Radio Service. While the band is crowded with repeater activity and simplex "ragchews", these frequencies are also a focus for more technical, even research, oriented activity such as exotic propagation, digital modes of communication, television and cooperative partnerships with university researchers, etc.

This band is an integral part of the emergency communications services provided by the amateurs in support of the Federal Emergency Management Agency, the National Weather Service and others. Recently, President Clinton and Vice President Al Gore visited the Birmingham area following the devastating tornadoes that killed many and destroyed much. The first news of the devastation and the only link to outside assistance for over an hour was provided on a frequency affected by RM—9267.

Consider the economic impact as well. A survey of most of the communication equipment manufacturers will uncover the fact that equipment utilizing this band is one of the most important product lines in their inventory. One might think that enough of the band will still be available to the amateur. Unfortunately, the current proposal is so poorly constructed that radios using the 70 cm band would be rendered useless. This should impact the nearly one million amateur operators in this country as well as amateur in other countries.

The military has primary control of the frequencies in question. Amateur radio and the military enjoy a special relationship. Whenever the military and amateur radio have shared frequencies in the past, the military has found amateur radio to be a good neighbor. The military experience with others sharing their frequencies has not always been as successful.

There is a more important and higher level reason to protect this and every amateur band. The Amateur Radio Service represents the electromagnetic equivalent of our national parks. This may seem a strange analogy at first, but after brief consideration I think that you will agree that the idea sticks. The amateur radio service has served as the breeding ground for scientific and engineering professionals. Many Nobel prize winners from fields as varied as Physics to Medicine are hams. Just as NASCAR serves as a proving ground for the automobiles that we will ultimately drive, the amateur radio bands serve as the proving ground for many of the telecommunication technologies that later drive the American economy. The cellular phone, the LEO's, the use of SSB by the USAF, a few examples of technologies that we now take for granted, were first developed by hams and used on the amateur bands. Few realize that amateurs put up their first satellite a couple of months before Telestar. When the nation has needed trained radio operators and individuals with electronics expertise, they turn to the amateur community. World War II is perhaps the best example. Amateur radio is the "seed corn" for telecommunications and electronic industry growth. This fact far outweighs any short-term advantage derived from re-allocating frequencies from the amateur service.

The evidence is clear. The LMCC request must be rejected.

Respectfully Yours,


Lakey Tolbert

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MAY 20 1998
FEDERAL COMMUNICATIONS COMMISSION

Cecil Casillas
12045 Lucile St.
Culver City, CA 90230

DOCKET FILE COPY ORIGINAL

May 15, 1998

Secretary Magalie Roman Salas
The Federal Communication Commission
1919 M Street NW Room 222
Washington, DC 20554

Subject: RM 9267

Dear Secretary Salas

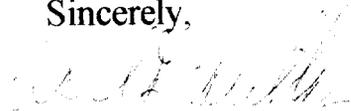
I am aware of the request for reallocation of the 420Mhz. To 430Mhz. Amateur to Private Land Mobil Radio Service. I strongly urge you to reject this request.

The Papa System is wide area repeater Link system that covers from San Diego to Pismo Beach. During disasters our system is made available to any group requiring emergency communication, during earthquakes, forest fires, mud slides and floods.

We provide backup emergency communication for the sheriff police and fire departments.

The frequencies specified in this request are used by amateur Operators to pass information in such an emergency. The loss of these frequencies would be a crippling blow to these activities.

Sincerely,



Cecil J. Casillas
WD6FZA

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May 18, 1998

Secretary
Federal Communications Commission
Washington, DC 20554

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MAY 29 1998

FCC MAIL ROOM

RE: RM 9267

Sir;

I have been made aware of an action by the "Land Mobile Communications Council" concerning that special interest group's desire for the reallocation of all or a part of the UHF Amateur Radio Band.

I have been active almost exclusively in that Amateur band for 15 years. I as well as other countless others, have a sizable financial investment in equipment as well as time. As the enclosed maps and documents will attest, we use the UHF Amateur band for both repeaters (440-450 MHZ) as well as a means to link (420-430 Mhz) those repeaters. These repeaters are used extensively for providing public service communications to various non-profit organizations, as well as Skywarn (a project of the National Weather Service) and in times of disaster.

I have been employed as a Deputy Sheriff in Midland, County, Texas for 20 years. A major portion of that time has been spent in the area of Public Safety Communications. In addition to those duties, I chair the Region 50 National Public Safety Planning Advisory Committee (NPSPAC). I have worked full-time and part-time in commercial two-way radio industry since 1969. I hold a General Class Radiotelephone Operator's Permit. I am a long-time APCO member. My Department is in the process of migrating to VHF narrow-band technology, known in some circles as APCO Project 25.

I feel this qualifies me to make several observations from several viewpoints:

1. Amateur Radio is used in our area for Crime Prevention activities, as well as reporting traffic accidents.
2. Amateur Radio is used for Skywarn activities, by these linked repeaters over the majority of West Texas.
3. Amateur Radio is written into our local disaster preparedness plan.

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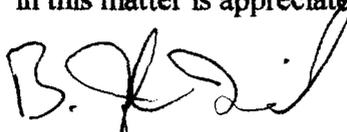
4. Due to the explosive growth of cellular and Specialized Mobile Radio (SMR), I have **personally** observed that VHF and UHF **Commercial** frequencies have become virtually abandoned. It is my opinion that if the Land Mobile Communications Council (of which I understand that APCO is a member of) needs additional spectrum, then they should follow APCO's lead and "Make do with what they have", and pursue these narrowband technologies in the existing Commercial VHF and UHF bands.

Should the FCC not comply with the wishes of the Amateur Radio Community, it should make provisions for the LMCC, or the successful bidder, to reimburse those individuals, groups and clubs that have made the considerable investments of time, money and equipment.

I would encourage you to deny LMCC's request, and recommend that they explore other means to fulfill their needs, meaning, narrowband technologies on existing frequencies.

I will encourage APCO to question the LMCC's intentions and purpose concerning this matter, and would be surprised if APCO is actually in agreement with the LMCC. APCO and Amateur Radio have had a positive relationship and common goals in the past. Many APCO members are also amateur radio operators.

These statements do not necessarily reflect the views of my employer. Your consideration in this matter is appreciated.



Sgt. B. John McDaniel, KE5PL
3611 Wedgewood
Midland, Texas 79707
915-688-1014

xc: Joe McNeil
President, APCO International
Harwich Fire Department
119 Depot Road West
West Harwich, MA 02671

Jack Keating
President-Elect, APCO International
City of West Covina Communications
P.O. Box 1440
West Covina, CA 91783-1440

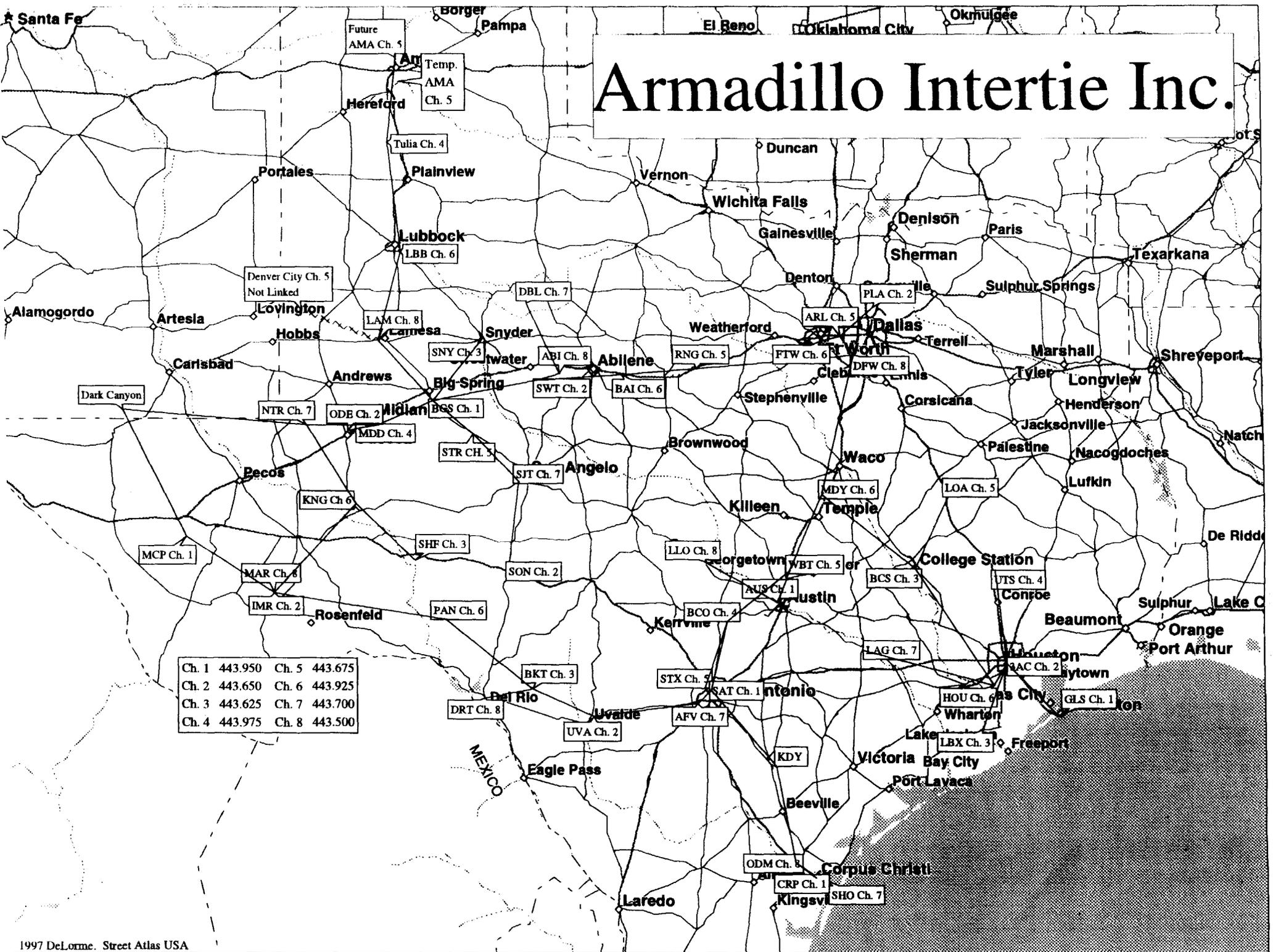
Christopher R. Bevino
APCO International Executive Director
2040 S. Ridgewood Ave.
S. Daytona, FL 32119-8437

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MAY 29 1998

FCC MAIL ROOM

Armadillo Intertie Inc.



West Texas Link Frequency Allocation

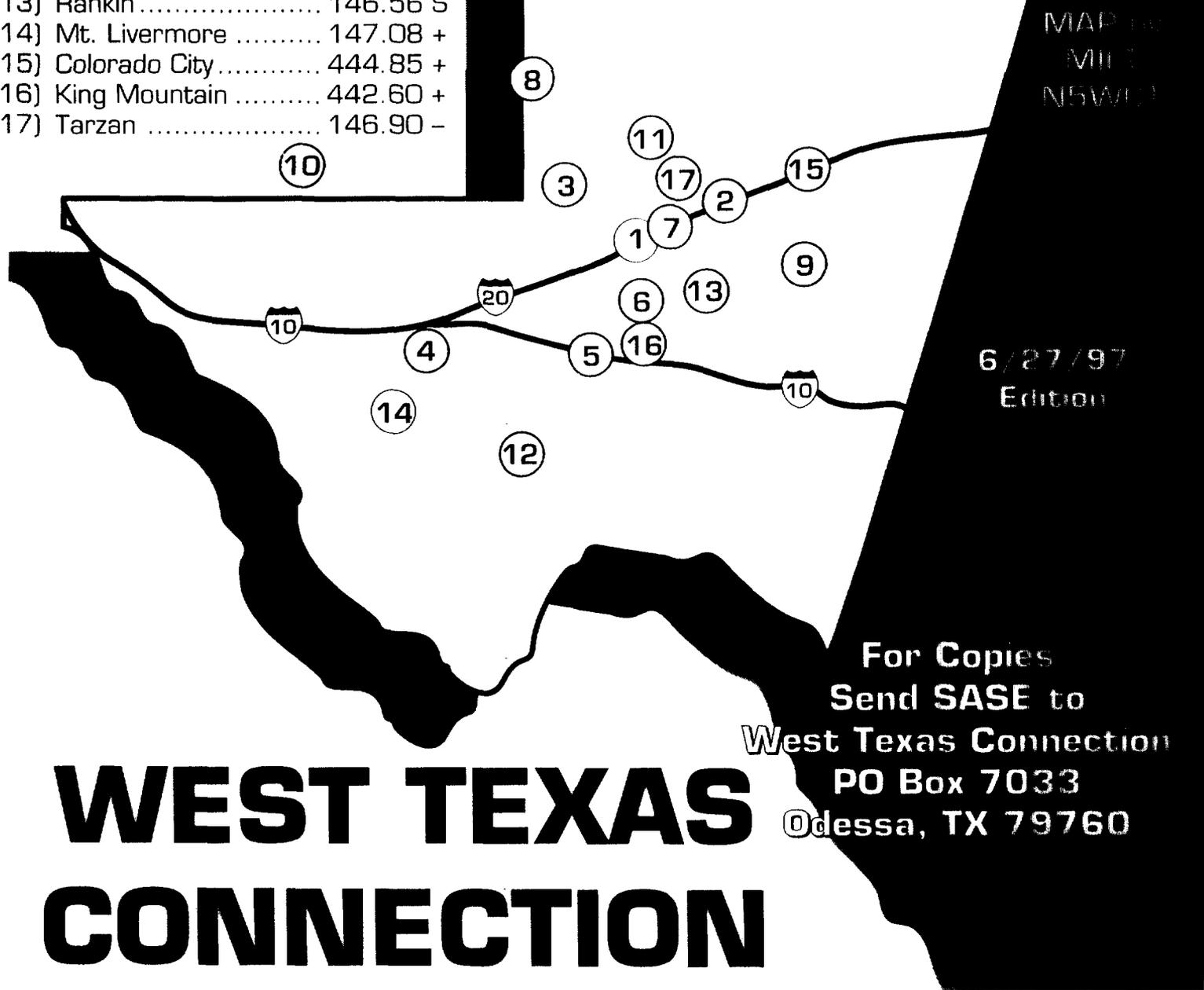
424.000	Sweetwater to Baird	429.000	Baird to Sweetwater
424.025		429.025	
424.050		429.050	
424.075		429.075	
424.100		429.100	
424.125		429.125	
424.150		429.150	
424.175		429.175	
424.200		429.200	
424.225	Reserved Intertie	429.225	McElroy to Dark Canyon
424.250	Reserved Intertie	429.250	Odem to Corpus Christi
424.275	Reserved Cactus	429.275	Reserved Cactus
424.300		429.300	Baird to Brownwood
424.325	Brownwood to Baird	429.325	Notrees to Midland
424.350	Caballo to Dark Canyon	429.350	Dark Canyon to Caballo
424.375	Reserved Cactus	429.375	Reserved Cactus
424.400	Sweetwater to Big Spring	429.400	Denver City to Lamesa
424.425	Reserved Cactus	429.425	Reserved Cactus
424.450	Midland to Odessa	429.450	Sheffield to King Mountain
424.475	Lamesa to Big Spring	429.475	Big Spring to Midland
424.500	Dark Canyon to Notrees	429.500	Notrees to Dark Canyon
424.525	Lamesa to Lubbock	429.525	Big Spring to Lamesa
424.550	Sterling City to San Angelo	429.550	Voter #3 to Midland
424.575		429.575	Voter #2 to Midland
424.600	Sterling City to Big Spring	429.600	Big Spring to Sweetwater
424.625		429.625	
424.650	Midland to Notrees	429.650	Marathon to King Mountain
424.675	Midland to Big Spring	429.675	Abilene to Double Mountain
424.700	Sweetwater to Abilene	429.700	San Angelo to Sonora
424.725	King Mountain to Sheffield	429.725	San Angelo to Sterling City
424.750	Sonora to San Angelo	429.750	Odessa to Midland
424.775	Lamesa to Denver City	429.775	Big Spring to Sterling City
424.800	Eden to San Angelo	429.800	Notrees to King Mountain
424.825	Double Mountain to Abilene	429.825	Unusable - ATV Color
424.850	Unusable - ATV Color	429.850	Spare Set - KE5PL
424.875	King Mountain to Notrees	429.875	Abilene to Sweetwater
424.900	Snyder to Big Spring	429.900	Voter #4 to Midland
424.925	Spare Set - KE5PL	429.925	San Angelo to Eden
424.950	King Mountain to Marathon	429.950	Lubbock to Lamesa
424.975		429.975	Big Spring to Snyder

rev. 04/27/97

- 1) Odessa (North) 146.70 -
..... 444.10 +
- 2) Big Spring 147.04 +
..... 442.10 +
- 3) Notrees 442.50 +
- 4) Kent/Balmorehea 145.43 -
- 5) Ft. Stockton 146.68 -
- 6) Crane 146.80 -
- 7) Midland 147.22 +
- 8) Hobbs 146.78 -
- 9) Sterling City 146.64 -
- 10) Dark Canyon 147.12 +
- 11) Andrews 146.48 S
- 12) Marathon 147.50 S
- 13) Rankin 146.56 S
- 14) Mt. Livermore 147.08 +
- 15) Colorado City 444.85 +
- 16) King Mountain 442.60 +
- 17) Tarzan 146.90 -

You can help keep the Connection going by subscribing to the West Texas Connection Newsletter for only \$12 per year. Newsletters bi-monthly and maps twice yearly. Send subscription requests to the address below.

All VHF inputs require 88.5 Hz tone
All UHF inputs require 162.2 Hz tone
Allow time when keying-up for repeaters down the system to react. WTC is a privately owned system.



WEST TEXAS CONNECTION

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 radio-location services.

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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.

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:

- East Kern County RACES
- Kern County Search and Rescue
- California City Search and Rescue

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,

 KE6KIN

Alan Heaberlin, KE6KIN

P. O. Box 2287

California City, CA 93504-0287

May 26, 1998

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MAY 29 1998
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REPORT 4711

MAY 26 1998

1919 M ST. N.W.

DAVID E. PALMITER
AMATEUR RADIO OPERATOR K8TJJ
9190 HUNTINGTON RD.
BATTLE CREEK, MI 49017-9730

MAY 26, 1998

SECRETARY OF FCC
1919 M ST. N.W.
WASHINGTON D.C. 20554

DEAR SIR:

RE: RM 9267

SINCE THE 70 CM BAND IS ESPECIALLY IMPORTANT FOR LINKING
REPEATERS ASSIST IN PUBLIC SERVICE, AS WELL AS GENERAL
AMATEUR USE, AMATEUR RADIO SHOULDN'T BE RESTRICTED FROM ITS
USE. WE WOULD APPRECIATE YOUR CONSIDERATION.

SINCERELY YOURS,

David E. Palmiter

Original rec'd
DATE

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

19 May 98

RECEIVED

Subject: RM-9267 Reallocation of the 420-450 MHZ band (70 cm) comment **MAY 29 1998**

Reference: Land Mobile Communications Council (LMCC) petition for rule making of reallocation of the 70 cm band. **FCC MAIL ROOM**

The 440 (70 cm) band is one of the two emergency system pillars serving the Fayetteville, North Carolina area. In the past few years this band has played a vital part in providing communications prior, during and after natural disasters that have struck our community. The loss of this band would further restrict the capability of the amateur community to provide emergency communication services/system to the community.

The 190 members of the Cape Fear Amateur Radio Society (CFARS) recommend that FCC non-concur with the RM-9267 petition for rule making. On the bases that this action would have an adverse effect on the amateurs ability to provide emergency communication to the community and cost effectiveness of reallocation. Additionally, the LMCC should immediately conduct an extensive RF spectrum impact study to find a more suitable segment of the RF spectrum for future use.

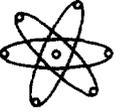
Signed Sincerely

William E Keelan Jr K44W

Cape Fear Amateur Radio Society Member

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WoRAD, INC.

SALES

COMMUNICATIONS

SERVICE

299 BROOKS STREET
 WORCESTER, MA 01606-3308
 (508) 852-2693 FAX (508) 852-2704

RECEIVED**MAY 29 1998****FCC MAIL ROOM**

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

Dear Ms Salas: Re: LMCC Petition for Rulemaking (RM9267)

This letter is in support of the Petition for Rulemaking filed by the LMCC seeking new spectrum allocations for private wireless users.

As a wireless communications dealer and service organization serving several hundred business, industrial and land transportation as well as public safety organizations in central N.H. and central Massachusetts in particular, we are acutely aware of the need for additional spectrum allocations for private wireless systems. We are particularly concerned over our inability to find useable local dispatch frequencies for use by potential customers who neither need nor want wide area coverage. Private medical, ambulance, security and maintenance facilities often need rapid access to a communication system where they can control traffic in the event of an emergency involving protection of life and property. Their need at the outset of an emergency may be more important than that of the public safety network.

We applaud the commission's efforts in addressing this issue and urge them to move quickly and favorably on the LMCC petition for rulemaking.

Sincerely,

WoRAD Inc.

Stephen A. Breed

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