

2M-9207

F.C.C.

In regards to 70CM ATV Activity. Baltimore Md.  
 Call is K3DRP and I am on ATV 37.4 lines  
 per week utilizing 421, 426.5, 439.25, 434  
 Simple and Repeated operation (W3WCG) with present  
 updating and equipment for utilization of these freqs.  
 I have approx. \$1000 invested. I am a relative  
 newcomer to this mode and I am enjoying it  
 immensely. At present the activity in this Area is very  
 active BRATS, CATS, and is growing. The released  
 article of LMCC FOR immediate relocation of 70CM  
 Band has been a very intimidating effect on all  
 HAM operators. The 70 CM band is very active and  
 needs to stay that way for the Honor and their Civic Involvement

PUBLIC REL. SERVICE DIV.  
 OMD-BL/STP/ST  
 JUN 5 3 21 PM '98

Thanks Stan Novack K3DRP  
 7644 Bay St  
 Pasadena Md. 21122

No. of Copies rec'd 0  
 List A B C D E OET

SHREVEPORT  
COMMUNICATION  
SERVICE

833 STONER STREET  
SHREVEPORT, LA 71271  
318-425-5177  
FAX 318-425-0955

RECEIVED

JUN 1 1998

FCC MAIL ROOM

DOCKET FILE COPY ORIGINAL



MOTOROLA  
A Division of World  
Communications

May 29, 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. Salas:

I am writing to let you know of my support of the Petition for Rule Making filed by LMCC seeking new spectrum allocations for private wireless users. Thank you for quickly placing the petition on public notice.

Shreveport Communication, a 40-year company, with 30 employees has served the North Louisiana and East Texas with all their wireless needs. Every week new companies are opening up with communication needs. Existing companies are expanding and need new equipment and spectrum.

Limited supply and in some case no supply of private wireless spectrum in the 150 MHz, 450MHz, 800 MHz and 900 MHz bands has hurt our ability to meet the communications needs of our customers.

Commercial systems such as cellular, PCS, 800 trunking can't solve all of the communications needs. Many companies need special coverages and immediate accessibility due to safety issues.

Everyday this issue becomes more and more a problem, thank you for addressing it in such a timely manner. If you have any questions, please feel free to contact me at 318-425-5977.

Sincerely,

Eddie Faith  
General Manager

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

2

OET

**PRAIRIE STATES COMMUNICATIONS, INC.**

P.O. Box 755

Imperial, NE 69033

308-882-4694 • 800-821-9340



**MOTOROLA**  
Authorized Two-Way  
Radio Dealer

POCKET FILE COPY ORIGINAL

May 28, 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. Salas,

This letter is to inform the FCC that I am in support of the Petition for Rule Making which was filed by the LMCC seeking new spectrum allocations for private wireless users. I would like to thank the FCC for quickly placing the petition on public notice.

My company is located in Imperial Nebraska, which is a very rural area in Southwest Nebraska. I have been established in the area since 1977 and currently employ six persons. My company is a provider of communications equipment and service in the area. Over the years I have noticed that available frequencies are becoming more and more congested. I would like the FCC to provide more usable frequencies for the citizens in our area. I also use 2-way radio to conduct the day to day business of my company.

Because of spectrum crowding I am finding that it is increasingly difficult to provide for the communications needs of persons and businesses in the Southwest Nebraska area. The 150 MHZ spectrum is very congested and is getting more and more "outside the area" interference. UHF frequencies are not as bad, but will be in the near future. Range limitations, that were shortened a few years ago, limit the ability of a lot of farmers and businessmen to cover the area they need. There are 800 MHZ SMRs in the area that do a good job even though they are becoming quite expensive to operate on.

Some of the problems caused by lack of spectrum are being taken care of by cellular telephone. Cellphones work quite well but do not address all user needs for 2-way radio. In many farming situations, instant communications are required for safty reasons. More frequency availability would provide communications throughout an agricultural business, making them safer and more profitable.

By adding more spectrum, my business would be able to provide more capability to users in this area, thereby providing more profitability to my business.

In closing, I would like to see the FCC move forward and address the problems of lack of spectrum as soon as possible.

Thank You

Richard L. Moses

cc: Senators Robert J. Kerry  
Chuck Hagel

RECEIVED

JUN 1 1998

FCC MAIL ROOM

No. of Copies rec'd 021

List A B C D E OET

1998  
Wednesday, May 27, 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. Salas:

We are filing this letter in support of the Petition for Rule Making filed by the LMCC that seeks new spectrum allocations for private wireless users. Thank you for placing this petition on public notice in a timely manner.

We have been in the Two-way Radio Communications business for approximately eighteen years here in rural southeastern Colorado. The city of Lamar is surrounded by wide-open ranch and farm land with the closest city approximately 110 miles away. Although we are a very small family business (five of us) and our customers number around four hundred, the individual lives that two-way radio communication affects out here is certainly in the thousands!

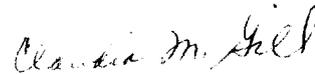
We sell, service and set up two-way radio/land mobile communications systems for state and local governments (i.e. school buses, fire, police, ambulances, hospitals), as well as private companies such as Utilities, Petroleum Exploration, and transportation. But 85% of our customers are primarily Ranchers and/or Farmers. Several ranch/farming families have been here for two and three generations and have come to depend on two-way radios as a cost effective means to coordinate and manage their business operations which can be spread over a couple of counties. Some so remote that they are too far from conventional telephone land-lines and have had us set up a "Point-to-Point" radio/telephone communication system for them. Our own business greatly depends on two-way radio communications since our technicians are required to travel sometimes as many as three hundred miles in a day in order to service customers in remote locations. Cellular and PCS service is not only quite expensive for small businesses but out here in rural America we have a problem with cell coverage.

A couple of years ago our business was in the process of obtaining an 800 MHz Trunked SMR license when the FCC froze that spectrum. We lost customers who were ready to go on that system and again when the FCC recently put a freeze on the 800 MHz Conventional Spectrum.

As you can see, this issue is of significant importance to us as it will have a profound impact on our business and on many other businesses that significantly contribute to the overall economy within our State and Nation!

In concluding I urge the FCC to address these issues quickly as the problem associated with the lack of spectrum are increasing.

Sincerely,

A handwritten signature in cursive script that reads "Claudia M. Gill".

Claudia M. Gill, EO

*LCI*

RM-4267

# Roger's Two Way Radio

**Communications for Today/Quality and Service for Tomorrow**

May 29, 1998

DOCKET FILE COPY ORIGINAL

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

Dear Ms. Salas:

Roger's Two Way Radio has been in business for 21 years. Roger's Two Way Radio started as a law enforcement radio service center with only a dozen customers. Today, Roger's Two Way Radio takes care of all communication within a 90 mile radius of Bemidji. Our staff consists of 20 employees. Roger's Two Way Radio is a Motorola Service Center. We take communication seriously, as it is our livelihood. Our business accomplishments include working on all communication/radio equipment from 150-900 MHZ as well as cellular and paging systems.

We are filing this letter in support of the petition for rule making filed by the L.M.C.C. seeking new spectrum allocation for private wireless users. Our business depends solely on customers that use private wireless radio systems on a daily basis. Roger's Two Way Radio exists solely to serve, sell and install two way radio communication equipment. Our business has benefited the local economy, and has been in Bemidji long enough to be a mainstay in the community.

Many of the two way channels are already crowded, especially 150-450 MEG. area. In our neck of the woods geography, as well as Norway Pine, limits the use of higher frequencies for good communication. 800 MEG trunks work, but takes a lot more repeaters. The freeze of the 800 channel, as well as the paging freeze, have drastically affected our business. We have had situations in which the inability to provide a customers with their own channel has hurt our profit. There are even situations where congestion on current channels has jeopardized the safety of employees, with customers complaining to us that they want their own channels.



102 Lincoln Ave. S.E. Bemidji, MN 56601  
(218) 751-3077 800-243-3077 FAX 751-0508

2

# Roger's Two Way Radio

**Communications for Today/Quality and Service for Tomorrow**

Page2

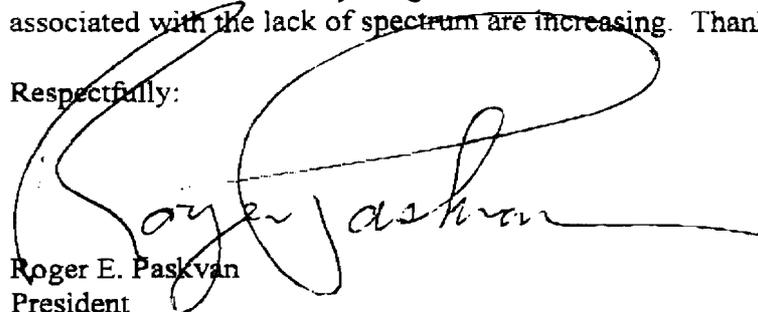
Cellular is not the answer. Phones are phones, and the ability to reach multiple units and control fleets is not handled well with cellular. PCS and cellular will not solve all communication needs.

Roger's Two Way Radio needs more spectrum. We need to apply for a license as a small business to solve the communication needs in our area. Spectrum auctions did nothing but hurt our business, and give channels away to big corporations with big pocketbooks who will abuse frequencies for \$ profits.

We need more private wireless spectrum allocations now. This new spectrum would greatly benefit Roger's Two Way Radio, and solve current problems we are having.

In conclusion, may I urge the FCC to address these issues quickly, since the problems associated with the lack of spectrum are increasing. Thank you for your consideration.

Respectfully:



Roger E. Paskvan  
President



102 Lincoln Ave. S.E. Bemidji, MN 56601  
(218) 751-3077 800-243-3077 FAX 751-0508

Before the  
Federal Communications Commission  
Washington, D.C. 20554

RECEIVED

JUN - 1 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	
	)	
Petition Filed by the Land	)	RM-9267
Mobile Communications	)	
Council to Reallocate	)	
Portions of the Amateur 70 cm	)	
Band to Land Mobile Use	)	

COMMENTS WILLIAM A. TYNAN W3XO

I wish to file comments opposing the Subject proposal.

Background

I have been a licensed amateur since 1945, obtaining the callsign W3KMY in early 1946. I upgraded to Class A (later called Advanced) in the fall of 1946 and to Extra in the early 70s. I obtained my present callsign in 1976. Throughout these 53 years, my principal interest has been in the bands above 50 MHz. I am currently operational on all bands from 50 to 1296 MHz. For eighteen years, from 1975 until 1992, I served as Contributing Editor to QST Magazine, responsible for the monthly column "The World Above 50 MHz". I was one of the founders of the Radio Amateur Satellite Corporation (AMSAT) and have been serving as its President since 1991.

Commentary

Even though the proposal offered by Land Mobile Communications Council (LMCC) does not directly address the weak signal, or amateur satellite portions of the 70 cm band that particularly concern me, I believe that its implementation will have a major impact on these operations in this important band. Therefore I am opposed to the petition filed by the LMCC to reallocate, or share, portions of the 70 cm (420 - 450 MHz) amateur band.

I outline my reasons, and suggest alternatives, below.

Two major problems internal to amateur radio already exist in this band. They are the proliferation of modes of operation, many inherently wideband in nature, and the increasing number of amateur radio operators resulting from the institution of the code-free license.

For example, several manufacturers currently offer low cost amateur television transmitters for the 420 - 450 MHz band. As no such amateur

023

television equipment is manufactured commercially for any of the amateur bands above 450 MHz, the 70 cm band receives the brunt of amateur television operation. Many of these commercial amateur TV transmitters, and most home constructed units, transmit signals 8 MHz in width (both sidebands). Thus, their operation often causes interference to other amateur activities, including weak signal work around 432 MHz and amateur satellite operation in the 435 - 438 MHz region.

I contend that, if the LMCC proposal for reallocation, or sharing, of 420 - 430 MHz and/or 440 - 450 MHz, is implemented, even more amateur television operation, as well as other types of amateur activity such as FM simplex and remote bases, will migrate into the remaining 10 MHz of the 70 cm band. There will probably also be tremendous pressure put on the Commission to change the amateur rules to allow repeater operation in this range as well. Any, or all, of these eventualities will cause intolerable interference to weak signal work in the vicinity of 432 MHz and to amateur satellite operation at 435 - 438 MHz.

I contend that sharing between land mobile operators and terrestrial amateur communication in the proposed band segments is not feasible. As stated below, it would be expected that the land mobile operators would employ conventional FM, just as do the amateur voice repeaters in this part of the spectrum. Thus, each would occupy similar bandwidths. In many parts of the U.S. particularly the large cities, the amateur band from 440 - 450 MHz is already completely filled with amateur voice repeaters. It is certain that these same cities are where LMCC is especially looking for additional space. Thus, these areas would bear the brunt of any sharing that might be attempted. These are also the areas in which a large number of amateurs reside. Therefore, numerous amateurs would be affected by any such sharing.

The 430 - 420 MHz segment, in the portions of the country where it is available, is widely used by amateurs for voice and data links, as well as for amateur television. It is almost certain that amateur repeater links and amateur television operators, experiencing interference from land mobile operators, operating in the proposed band segments, would move into the 430 - 440 MHz band, including both the area around 432 and the amateur satellite portion at 435 - 438 MHz. I know that this kind of situation already presents a serious problem in the many other countries, where only 430 - 440 MHz, or parts thereof, is available for amateur operation. Thus, in these countries, all modes must share this narrow band of frequencies.

It is all but certain that acceptance of the LMCC proposal, will guarantee that the same bad situation will exist here, to a much greater degree than it already does today.

The LMCC does not specify in its filing that it has studied other frequency bands that might be available to meet its needs. It merely seeks to take over, or share, a heavily used amateur radio allocation; one which amateurs already share with government radiolocation. It is not clear whether LMCC proposes to also share with government radiolocation or not. One wonders what DoD and NTIA comments on the LMCC proposal will be.

The LMCC petition is also unclear as to how it would make use of the spectrum it is seeking. Nothing regarding the technology that would be employed is covered in the filing. One can only assume that conventional FM would be utilized. There is no discussion of the use of more modern technology, such as spread spectrum (SS) or amplitude compandored single sideband (ACSSB). I have monitored the 220 - 222 MHz and found that ACSSB equipment is being used in that band taken away from the amateurs several years ago. Thus, it would appear that ACSSB equipment is available. Why does LMCC not consider using such equipment on the bands already allocated to land mobile, in order to generate additional channels within existing allocations? Presumably, ACSSB channels could be place between existing FM channels in those bands already allocated to land mobile. Eventually, all land mobile operation could be converted to ACSSB, generating a substantial increase in the number of available channels. Alternatively, the use of SS systems, overlaying existing land mobile channels could be considered as another possibility for increasing channel capacity.

#### Conclusions and Recommendations

For the reasons cited, I strongly urge that the Commission not consider reallocating, the frequency bands proposed by LMCC to land mobile operation or allow sharing with current amateur operations. I also urge LMCC to explore other frequency band alternatives and/or newer technologies that might permit them to meet their perceived needs.

RESPECTFULLY SUBMITTED,

By   
William A. Tynan

May 29, 1998

JUN - 1 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Before the  
Federal Communications Commission  
Washington, D.C. 20554

In the Matter of	)	
	)	
Petition Filed by the Land	)	RM-9267
Mobile Communications	)	
Council to Reallocate	)	
Portions of the Amateur 70 cm	)	
Band to Land Mobile Use	)	

COMMENTS OF THE CENTRAL STATES VHF SOCIETY

The Central States VHF Society (CSVHFS) submits these comments in response to the petition submitted by the Land Mobile Communications Council (LMCC).

Background

The CSVHFS is a not-for-profit organization chartered in the State of Missouri. It was begun in the mid-1960s to foster amateur radio operation on the bands above 50 MHz. Membership currently numbers about 300, principally in the Midwest states. However, the Society has members in states from the Atlantic Coast to the West Coast, as well as Canada and several foreign countries. Our members are some of the most active in weak signal VHF, UHF and microwave work, including both terrestrial and Earth-Moon-Earth (EME) and terrestrial techniques.

CSVHFS sponsors an annual conference, at which experts on equipment and propagation associated with the bands above 50 MHz present papers on their latest work and findings.

Even though our membership is concentrated in the Midwest, and cannot be considered large, CSVHFS is generally considered to be the premiere U.S. organization promoting amateur operation on all of the bands above 50 MHz.

CSVHFS Position

The CSVHFS strongly urges the commission to deny the petition filed by the Land Mobile Communications Council (LMCC) to reallocate portions of the 70 cm (420 - 450 MHz) amateur band to land mobile use, or to institute sharing of any of these frequencies with land mobile operators.

of copies rec'd 023  
DE OET

Even though the LMCC proposal does not directly address the weak signal, or amateur satellite portions of the 70 cm band that are of particular concern to our members, and all amateurs engaged in weak signal work on the 70 cm band; CSVHFS believes that implementation of the LMCC proposal will have a major impact on all weak signal operations in this important band.

We will outline our reasons, and suggest possible alternatives to the LMCC proposal in these comments.

Two major problems already exist in the 70 cm band. These are:

1. The proliferation of modes of operation, many inherently wideband in nature  
and
2. The increasing number of amateur radio operators resulting from the institution of the code-free license.

Important in the first one is the fact that several manufacturers currently offer low cost amateur television transmitters for this band. As no such amateur television equipment is manufactured commercially, for any of the higher amateur bands, most amateur television activity takes place in the 70 cm band. Many of these amateur TV transmitters, both commercial and home built, have no provision for suppressing the lower sideband. Therefore, they transmit signals up to 8 MHz in width. For this reason, their operation can cause interference to other amateur activities, including weak signal work around 432 MHz, as well as amateur satellite operation in the 435 - 438 MHz region.

CSVHFS contends that, if the LMCC proposal for reallocation, or sharing, of 420 to 430 MHz and/or 440 to 450 MHz, is implemented, even more amateur television operation, as well as other types of amateur activity such as FM simplex and remote bases, will move into the remaining 10 MHz of the 70 cm band. There will probably also be tremendous pressure put on the Commission to change the amateur rules to allow repeater operation in this range also. Any, or all, of these eventualities will cause intolerable interference to weak signal

work in the vicinity of 432 MHz and to amateur satellite operation at 435 to 438 MHz.

CSVHFS fails to understand how amateur and commercial operations could co-exist in a common band. This would surely cause the above-mentioned push, on the part of amateur repeater operators, into the remaining portion of the band, just as an outright reallocation would.

The 430 to 440 MHz segment, in the portions of the country where it is available, is widely used by amateurs for voice and data links, as well as for amateur television. It is almost certain that operators of these systems would also move into the 430 to 440 part of the band, including both the area around 432 and the amateur satellite portion at 435 to 438 MHz. We are aware that this type of situation already exists in many other countries, where amateurs have only 430 to 440 MHz. In these countries, all modes must share a 10 MHz wide band, and in some countries less than that. Certainly, acceptance of any part of the LMCC proposal, will guarantee that the same bad situation will exist here, to a much greater extent than it does already.

The LMCC filing does not disclose that it has studied other frequency bands that might be available to meet its needs. It simply proposes to take over, or share, a heavily used amateur radio allocation; one which amateurs already share with government radar. We don't know if LMCC proposes to also share with government radar or not. Has the Department of Defense been asked about the feasibility of sharing with commercial operators, or moving their radars someplace else?

The LMCC petition also does not specify what type of equipment would be used if they do get access to the 70 cm amateur band. We can only conclude that they would use FM, like that used in land mobile service in the 450 to 474 MHz band, and elsewhere; and like that used by amateur FM operators on the 70 cm band. They do not say if they have looked at other frequency bands, or other technologies that might make better use of the frequencies they already have. CSVHFS urges that both alternatives be carefully studied before any consideration is

given to taking away, or sharing additional amateur frequencies.

For the reasons cited, CSVHFS strongly urges that the Commission reject the LMCC proposal in its entirety.

RESPECTFULLY SUBMITTED,  
Central States VHF Society

*D.H. Hagedorn*

D.H. Hagedorn AJ0E  
President

FCC MAIL ROOM

JUN - 11 1998

RECEIVED

Richard A. Ide, N7LDI  
Box 566  
Sonoita, Az. 85637  
602-998

FCC  
Sec of the FCC, Rm 222  
1919M St. NW  
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Reference RE:RM9267

Dear Sir:

I'm a ham radio operator, live in a motorhome and call the southwestern United States my home territory. My motorhome is radio equiped for 3 meters, 220 and 440. I use this as my primary communication. I'm able to position the motorhome as a communications station at most locations and have done so in many contests, field day operations, simulated emergency exercises and once I helped with communications during a California earthquake situation. My primary communication is using the CACTUS intertie amateur system which has remotes using the 440-450 band and links between remote sites using 420. The coverage is from Sacramento, California southward thru LA and across Arizona, New Mexico and Texas. Links northward include also Las Vegas, Salt Lake, southwestern Utah and southeastern Colorado.

I'm concerned about the move by others to impose on these bands and this system and possibly make my capability obsolete. Thank you.

Sincerely,



0  
OET



# GRANITE ELECTRONICS, INC.

535 NORTH 31ST AVENUE  
ST. CLOUD, MN 56303

TELEPHONE 320-252-1887  
FAX 320-259-5997

May 30, 1998

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

I would like to express my feelings with support for the Petition for Rulemaking filed by the LMCC seeking new spectrum for private wireless users. I do commend the FCC for acting quickly to place the petition on public notice.

Granite Electronics Inc., is located in Saint Cloud MN, and has been in the business of working with two-way radios for over 35 years. We currently have 17 employees and service a seven county section of central Minnesota. We are located approximately 60 miles NW of the Twin Cities metropolitan area, the majority of our customer base are rural Minnesota farmers, construction companies, public service entities, and general businesses.

My personal experience for the last nine years has been a rewarding job of working with these entities and seeing how their communications systems have provided safety and saved them time and money. Approximately 80 percent of our customers are utilizing a privately owned base station, repeater, and mobile radio communications system. With the remote location and the sparse population of our area, the large Cellular, PCS, Nextel etc., companies will not cover all the places where we need to provide coverage for our customers.

Our customer base has grown from approximately 750 customers in 1990 to over 1600 at the end of 1997. This growth is something that continues because we have something of value to offer. Dispatch radio is very important to our business and our customers. The dial-up systems that the wide area service providers offers is both expensive and cumbersome to use as compared to the push to talk service that dispatch offers. With this rapid growth we are seeing the current channels becoming more and more congested. At some point the service is going to become unusable.

In closing I urge you to consider the needs of citizens such as our customers, our employees and families in rural America who depend on Dispatch radio and the Private Radio Service and that the need for more spectrum is real and hopefully the steps are taken to ensure that more spectrum is allocated.

Sincerely

Michael A. Kahl  
Granite Electronics Inc.

0  
OST



**CITGO Petroleum Corporation**

135th Street & New Avenue  
Lemont, IL 60439-3659

May 20, 1998

DOCKET FILE COPY ORIGINAL

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

Dear Ms. Salas:

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

I am filing in support of the Petition for Rule Making filed by the LMCC (Land Mobile Communication Council) seeking new spectrum allocations for private wireless users. I applaud the FCC for quickly placing the petition on public notice.

Citgo Petroleum Corporation is a manufacturer, marketer and transporter of gasoline, jet turbine fuel, diesel fuel, heating oils, lubricants, refined waxes, petrochemicals, asphalt and petroleum-based industrial products. Citgo owns and operates crude oil, asphalt and lubricant refineries throughout the United States. Radio communication plays a vital part in manufacturing our product and maintaining a safe work place for our employees.

All of our refineries depend heavily upon radio communication to operate our facilities. Each of our three major crude oil refineries uses 800/900 MHz trunked systems along with various 150 MHz and 450MHz frequencies. Our private wireless radio system are hybrid systems that provide effective internal communications among team members operating complex machinery and monitoring remote equipment, among other uses. These internal communications are critical in ensuring the execution of operational and administrative objectives such as improving efficiency and productivity, and enhancing safety to employees and community.

The ability to have absolute control of our own private radio system is essential to maintaining the level of service required to respond to emergency situations. PMRS (Private Mobile Radio System) users need to provide maximum levels of power backup, sufficient bandwidth to accommodate peaks of emergency traffic, and enhanced features such as prioritizing calls or emergency button notification. All of these features, which are not available through CMRS (Commercial Mobile Radio Service) are an integral part of our emergency responsiveness.

0  
OET

Page Two

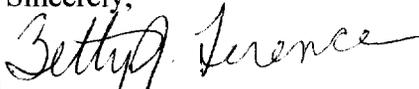
There are many reasons why Citgo would not be able to switch to a CMRS. The ability to control and maintain our radio system without depending upon a commercial service who might merge, get acquired or go out of business suddenly leaving our unique communications needs in jeopardy, is critical to our operation. Petro-chemical companies are required to operate with only Factory Mutual Approved intrinsically safe radios for communications in explosive environments. Currently, CMRS service providers do not offer intrinsically safe equipment and, therefore, cannot be used in these environments where communication is vital.

Commercial carriers do not provide assurances of reliable coverage within building facilities throughout our manufacturing plants. Special enhancements are made to our private systems to accommodate extra thick structured walls and underground facilities. CMRS service providers do not know how to handle unique coverage situations. In the oil refining industry communicating among work teams instantaneously in order to coordinate daily activities, as well as control emergency situations is critical and would endanger employees and community if they were delayed because of overload on a CMRS.

The costs of access charges and usage rates associated with subscribing to CMRS providers would increase our radio communication costs without providing any additional services. Even though this would be a concern, the issues of immediate accessibility, system design enhancements and access to emergency fire, police and ambulance, far out weigh the additional expenditure.

Our commitment to the community and environment requires Citgo to act responsibly in providing reliable communication in life-threatening emergency situations. Commercial carriers will not provide assurances of guaranteed access to their systems in the event of disasters. Our industry continues to rely upon private radio systems and continued spectrum allocations to accommodate all our communication needs. I urge the FCC to address these issues quickly as the problems associated with the lack of spectrum are increasing.

Sincerely,



Betty J. Ference  
Manager, Telecommunications



F. Michael Wilkins  
Manager, Public Affairs  
& Community Relations

**BOB MACKIE**

INDEPENDENT ADJUSTER

INSURANCE CLAIMS • INSURANCE INVESTIGATIONS  
P.O. BOX 13565 • SPOKANE, WASHINGTON 99213-3565  
PHONE (509) 928-3830

May 26, 1998

DOCKET FILE COPY ORIGINAL

AMERICAN AUTOMOBILE ASSOCIATION  
1000 AAA DRIVE  
HEATHROW, FL 32748

Sub: RM-9267

Dear Sirs:

I have been a very satisfied member of the AAA's Inland Automobile Association in Spokane, WA for several years, however, I have learned that an organization of which AAA is a member has allegedly taken a position, with the support of AAA, that is contrary to my interests.

On April 22, the Land Mobile Communications Council filed a petition with the Federal Communications Commission (designated as RM-9267) that seeks to reallocate the frequency bands 420-430 and 440-450 MHz for the use of Private Mobile Radio Service. These bands are now heavily used by radio amateurs, operating in the Amateur Radio Service, for a variety of public service and public interest communications. The reallocation proposed by LMCC is incompatible with these operations.

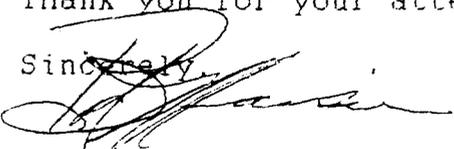
As a continuous radio phone operator licensed since Jan. 8, 1944 and a licensed amateur radio operator since Mar. 13, 1980, I am dismayed to find that AAA, an organization I have so long supported, is listed as an apparent sponsor of this proposal. Amateur radio plays a very important roll through the Washington State, Spokane County, City of Spokane Department of Emergency Services, as well as FEMA, Red Cross and Salvation Army, just to mention a few. These frequencies are used for cross country repeater links, as well as direct lines, one to one communication.

I ask you to determine whether AAA has, infact, adopted a position in support of RM-9267, and if so, what steps can be taken to request reconsideration of this position. If AAA has not adopted a position in support of RM-9287, I request a written statement to that effect.

0  
OCT

Thank you for your attention to this very important matter.

Sincerely,

  
Bob Mackie (KC7IE)

copy: Office of Secretary of Federal Communication Commissioner  
Room 222  
1919 M Street NW  
Washington D.C., 20554

copy: ARRL  
225 Main Street  
Newington, CT 0611

copy: Inland Automobile Association  
AAA Automobile Club Services  
1717 West 4th Ave.  
Spokane, WA 99204

RECEIVED

MAY - 1 1998

DOCKET FILE COPY ORIGINAL

Ray Lewis, N8EHM  
1340 Burgundy  
Ann Arbor, MI 48105

May 29, 1998

File #RM-9267  
Office of the Secretary  
Federal Communications Commission  
Room 222  
1919 M Street NW  
Washington, D.C. 20554

TO WHOM IT MAY CONCERN:

As a member of R.A.C.E.S., A.R.E.S., and Skywarn, I am writing this letter in opposition to the petition filed by the Land Mobile Communications Council to reallocate two-thirds of the 420-450 MHz band to the Private Mobile Radio Service. Reallocation of this band would be very bad news for public safety, because it would seriously impair the ability of emergency management personnel to effectively respond to emergency and disaster situations like the tornado outbreaks in central Florida and northern Alabama. Whenever southeastern Michigan is threatened by severe weather, all of the emergency management offices in the region are linked together using the 70 cm band. Even though the 2 meter band is used extensively for public service communications, experience has shown that it is not always reliable due to problems such as "over-the-horizon" interference. In addition, the loss of the 70 cm band would no doubt lead to more crowding and interference on the other amateur bands such as 2 meters. In my opinion, the ability of amateurs involved in public service to assure the safety of the general public far outweighs what is primarily the needs of commercial interests represented by the L.M.C.C. I strongly urge you to reject this proposal.

Sincerely



Ray Lewis, N8EHM

Washtenaw County, Michigan R.A.C.E.S./A.R.E.S./Skywarn

0

**Radius™**  
Radio Sales & Rental

**FOLSOM'S COMMUNICATIONS, INC.**

52 WESTERN AVE. SW, FARIBAULT, MN 55021  
507-334-6481 TOLL FREE 800-658-7020  
Fax 507-334-0229



DOCKET FILE COPY ORIGINAL

RECEIVED  
May 27 1998

MAY - 1 1998

ROOM 222

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

Dear Ms. Salas

**Subject: LMCC Petition for Rulemaking (RM-9267)**

Please consider this communiqué as my filing in support of the Petition for Rule Making filled by the LMCC seeking new spectrum for private wireless users. I commend the FCC for acting quickly to place the petition on public notice.

Folsom's Communications, Inc. is located in southern Minnesota and is in the business of providing Wireless Communication Equipment, Service (Private Carrier Repeaters) and system maintenance for users of the Private Radio Service. We have been in this business since 1950. We employ nine people who depend on their jobs here as the primary support for their families.

At present, we serve approximately 1,400 users of The Private Radio Service. The vast majority of our customers are involved in farming and/or support of the agricultural community. Their needs, as well as ours, are best served by the Private Radio Service with Dispatch Two Way Radio.

With farming being one of the most hazardous occupations in the nation, speed of communications is paramount for safety reasons. The "Dial Up" operation of systems such as Cellular, PCS, NEXTEL, etc. are both cumbersome and slow compared with Dispatch Radio.

In addition, being in a rural setting where Cellular, PCS, NEXTEL, etc. will not cover all the places where we need to provide service for our customers, we, as well as the majority of our customers, must depend on the Private Radio Service for our communications. The frequencies we have now are extremely congested. In some cases we are unable to serve the needs of potential customers because of possible conflicts between users in competitive business not wanting to share the same frequencies.

Without new frequencies we will not be able to serve the communications needs of those potential customers. The recent auctioning of frequencies and the planned auctioning of more frequencies promises to make matters worse.

0  
ET

Ms. Magalie Roman Salas

May 27, 1998

Page two

As a person who has been in wireless communications since 1962, I believe it is imperative that we have more spectrum allocated for the Private Radio Service to be able to serve our present customers and those who are seeking fast, efficient, and affordable wireless communications.

As the CEO of Folsom's Communications, Inc. and the employer of nine (9) people, I can not help but be extremely concerned as I see private radio spectrum being sold at auction. I wonder what will become of my employees and me and how our customers needs will be served as even more spectrum is sold at auction and no new spectrum is allocated.

In closing, I respectfully urge you to consider the needs of citizens like our customers and me in rural America who depend on The Private Radio Service and find that the need for more spectrum is real and take the proper steps to ensure that it is allocated.

Sincerely



Howard J. Christenson  
CEO

RECEIVED DOCKET FILE COPY ORIGINAL

MAY 28 1998

May 28, 1998

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

RE: RM 9267

Dear Commission:

As a licensed Amateur Radio operator, I want to go on record as being very 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 communications.

The frequency band including 420MHz to 430MHz and 440MHz to 450MHz, 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 in the State of Texas and all over the United States.

I am one of the Emergency Coordinators for the ARES Skywarn system for Taylor County here in Texas. We have spent thousands of dollars to install and maintain a linked repeater system that connects our local Skywarn spotters with the National Weather Service in San Angelo, TX. and also with the NWS in Ft. Worth, TX. This link system has repeaters in the 440MHz band with links in the 420MHz band. This repeater system is the only communications that we have during Severe Weather outbreaks in our area. We are responsible for Skywarn coordination for a 9 county area here in the state. I also know that many other areas use similar systems. Just this past week, we used this system to track, confirm and warn of a Tornado in Tom Green County, TX. Any disruption of this system would be a detriment to the early warning system now in use. The wording of RM-9267 does not address the importance of these frequencies for Amateur Emergency use, nor does it provide for a continuance of this service for our use.

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.

Commission approval of any PMRS (or similar) allocation on this or any amateur frequency band will effectively terminate any Amateur Radio operations within that specified band. Amateur Radio operations in Texas and all other states which are a vital communications resource to the public during emergencies and disasters will be very badly damaged by the loss of 49 percent of the available VHF amateur spectrum below 900MHz. There are over 20,000 licensed and coordinated Amateur repeaters in this spectrum that would be negatively affected by RM-9267. This would be a crippling blow to the Amateur Radio Emergency Service, The RACES network, and the Amateur community in general.

I am sending copies of this letter along with other important document to Congressman Charles Stenholm of our district.

I very strongly urge the Commission to DENY the above specified portions of RM-9267.

Sincerely



John Bogart  
Radio Amateur Callsign WX5TX

ET

RECEIVED

DOCKET FILE COPY ORIGINAL

JUL 1 1998

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

Dear Secretary,

I respectfully submit these comments on behalf of my self, Dennis H. Morales AD6EZ, as well as that of the United States Amateur Radio Community at large.

The re-allocation of those portions of the 400 megahertz, 420 to 430 and 440 to 450MHz. Radio spectrum from the Amateur Service to the Land Mobil Communications Council will greatly reduce our ability to provide emergency communications during local and national crisis. The radio 400 MHz repeaters located throughout the country link many emergency response teams that provide critical assistance to, but not limited to, law enforcement agencies; medical response units, mobile and hospitals; fire fighting agencies, and other assisting agencies such as the American Red Cross.

The Amateur Radio Emergency Service - ARES and the Radio Amateur Civil Emergency Service - RACES are the two main Amateur Radio services that provide the services described above. The men and women, and many time young adults, maintain a year-round preparedness in order to respond at literally a moments notice. In many cases we are on site and on the air even before local law enforcement and fire departments arrive on the scene. This doesn't just happen because it is a hobby to most of us. It happens because we feel a responsibility to aid our neighbors and provide a much needed community service. Most of the equipment used by ARES and RACES is provided by the radio amateurs themselves and the many hours, days and weeks that is required to train so that we are as prepared as possible is time given up freely without any compensation other than knowing we are providing a critical service. Through the generous allocation by you, the FCC, of the various frequencies we have at our disposal, we as amateur radio operators, are able to serve our cities, counties, state and country.

One only has to look back into our recent past and see where ARES and RACES have answered the call to duty. This country has experienced severe weather conditions this past winter and spring with one major storm after another. Tornadoes, hurricanes, floods, and earthquakes have brought on one disaster after another. In each case one can go back and see who were on site providing critical communication services. It was, and always will be the people that make up the ARES and RACES organizations. But we can not continue to provide this service if our frequencies are re-allocated out from under us. That would be the same as taking away the firemen's hoses and expect them to be prepared for the next emergency where they will be needed.

No. of Copies rec'd 0  
List A B C D E OET