4. Technological forecasting is a most difficult and inaccurate process, thus it is difficult to forecast developments that individual amateurs will make using the 420-450 MHz band in the future. In my 40 years in amateur radio, I have seen an explosion of development by amateurs - many using the 420-450 MHz band - which have since developed into very significant public/commercial/government useage. Some examples are video teleconferencing, phone patching using repeaters (today's cellular phones), and packet radio and its influence on the world wide web.

5. A large portion of the radio spectrum is already utilized by commercial enterprises and LMCC could use allocations which are already commercial, and not require use of the amateur bands which are a public resource. I thereby strongly believe that this rule making proposal should be rejected.

Respectfully Submitted,

Ruth E. Phillips

Ruth E. Phillips, K3AGR
2911 Arundel Rd West
Arundel, MD 21077

5-28-98

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Before the

Federal Communications Commission

Washington, DC 20554

In the Matter of	)	
Proposed Reallocation of 420 to 430 MHz	)	
And 440 to 450 MHz from the Federal	)	**RM 9267**
Government to the Private Mobile Radio	)	
Service	)	
	)	

1. Having been an amateur radio operator for 51 years, an electronic engineer at Naval Research Lab for 29 years, and having been an active amateur using the 420-450 MHz for amateur television (ATV) for over 25 years and for earth-moon-earth (EME) communications, I strongly oppose the LMCC Petition for Rule-making.

2. Much of the technology now in public use was developed on the amateur bands by radio amateurs. The freedom of radio amateurs to experiment and develop communication technology is extremely important for the public interest. Without useable frequency bands, the right of future generations of American citizens to become radio amateurs and contribute to the public interest in their own personal way would be jeopardized. I as an amateur using the 420-450 MHz for fast scan ATV, have experimented with two way interactive television demonstrating the feasibility of low power, < 100 watts, television coverage for isolated communities or specialized interests. Millions of dollars of research, with no cost to the government or private industry, was achieved by amateurs in the 420-450 MHz band. Communication technology is in a high state of flux presently and there is much more experimentation to be done, thus this is not the time to give away the amateur frequencies needed to continue experimentation.

3. ATV is used for simulated emergency tests (SET), tornado watches, digital visual message centers, and remote monitoring of parades, etc., making primary use of repeaters in the 420-450 MHz band. The proposed rule would eliminate ATV repeaters from the band, thus eliminating much of the effective use for public interest. I have invested thousands of dollars in equipment for the 420-450 MHz band and much of my equipment would not be useable at higher frequencies.

4. Technological forecasting is a most difficult and inaccurate process, thus it is difficult to forecast developments that individual amateurs will make using the 420-450 MHz band in the future. In my 51 years in amateur radio, I have seen an explosion of development by amateurs - many using the 420-450 MHz band - which have since developed into very significant public/commercial/government useage. Some examples are video teleconferencing, phone patching using repeaters (today's cellular phones), and packet radio and its influence on the world wide web.

5. A large portion of the radio spectrum is already utilized by commercial enterprises and LMCC could use allocations which are already commercial, and not require use of the amateur bands which are a public resource. I thereby strongly believe that this rule making proposal should be rejected.

Respectfully Submitted,

David H. Phillips

David H. Phillips, W3PJM

2901 Accokeek Rd. W
Accokeek, MD 20607
9645

5-28-98

DOCKET FILE COPY ORIGINAL

James L. Griggs, W7MCO
Route 1 Box 116
Duncan, AZ 85534

May 26, 1998

Federal Communications Commission
Secretary of the FCC, Room 222
1919 M St. N.W.
Washington, DC 20554

Dear Commission: REF: RM-9267

I have been a licensed Amateur Radio operator since 1957, and feel that I must comment in opposition to the proposal of the Land Mobile Communications Council. I am quite active and involved in the amateur operations that take place in the spectrum mentioned in this proposal.

The proposal to SHARE these frequencies on a secondary basis to LMCC would be catastrophic to both primary and secondary users. Then when the primary user complained about the secondary users interference, the secondary users would be required to CEASE operations. Thus forcing amateur operations to become non-existent. No where in the LMCC proposal was any technical example on HOW this sharing would be implemented. Currently the Amateur Service is secondary to the Military radio-location service. This has proven to be a successful example of sharing, as the two services utilize two completely different type of operation. The amateur service has been able to tolerate the intermittent interference from the Military. The Military has been able to operate effectively with the secondary amateur use of the spectrum. The sharing has been going on for many years.

LMCC use of the spectrum would be utilizing similar/same modulation methods. Modes of operation would be mobile relay, dispatch, voice-two-way radio usage. These are of the same types of use that amateurs use.

Looking at published amateur radio frequency coordination data on the amount of spectrum occupied in the 420-430, and 440-450 spectrum, it is the second most populated amateur radio band between 30 and 900 MHZ. Approximately 49 percent of this amateur usage is located in this subject band.

In Arizona I am involved in the technical operations of two large LINKED Amateur Radio systems. Many of the frequencies utilized to inter-link these systems operate in the sub-bands proposed for re-allocation by LMCC. It would be very costly to attempt to re-locate these operations to other UHF frequencies. In many areas, there are no frequencies to change to due to current use by other operations, such as Data and Amateur Television use.

Amateur Radio is a natural resource. We have in this country other examples of natural resources that the public has stated that they desire to keep NATURAL. Examples include wilderness areas, US Forests, Species of Wildlife and others. Amateur Radio is a national resource of trained radio technicians, and operators. Frequencies need to be kept in RESERVE If all radio frequencies are sold/re-allocated to the highest bidder, this national resource would no longer be available to the citizens of the United States.

Therefore I strongly urge the Commission to DENY RM-9267 from the LMCC. Amateur Radio requires space to carry out it's operations, and provide the public services it has for so many years provided to this country.

Respectfully submitted,

James L. Griggs, W7MCO

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,

1220 Sunny Oaks Circle
Altadena, CA 91001

Federal Communication Commission
Secretary, Room 222
1919 M. Street, N.W.
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: **RM - 9267**

Dear Commission:

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I am active on many Amateur Radio frequencies that promote public welfare through emergency, disaster and public service communication. 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 and our communities through our work. These frequency segments also include important linking, control, and repeater systems that are used daily in our area.

One of the five reasons that our Government created the Amateur Radio Service was to have a readily available pool of trained operators to assist with emergency communications when the unexpected occurs. While Amateur Radio is allocated as the secondary user of these frequencies, our emergency networks have caused little interference to the primary user, the United States Government. RM-9267 contains no technical solutions that prove Amateur Radio operators could continue to use these bands for emergency preparations and operations if land mobile communications became the primary user. In Southern California, this relatively small portion of Spectrum will quickly fill up with bases, mobiles, and repeaters assigned to businesses, leaving amateurs and their established emergency communication networks ineffective with the inevitable increase in business traffic under RM-9267.

Please consider fully the consequences of RM-9267 and assigning primary frequency usage to Land Mobile Radio. As a member of the Amateur Radio Community, I want to continue to serve my National, State, and Local Governments by providing my equipment and services during an emergency. RM-9267 will limit the amateur radio operator's access to these frequencies and will definitely interfere with all amateur disaster preparation communication efforts.

Sincerely,

KF6PMD

Federal Communication Commission
Secretary, Room 222
1919 M. Street, N.W.
Washington, D.C. 20554

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Sincerely,

KB6 SRT