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Statement of Opposition to RM-9267
David Dobrin, KD6AOE, 10176 Swallow Ave, Fountain Valley, CA 92708

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Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of)
)
An Allocation of Spectrum for)
Private Mobile Radio Services) RM-9267
)

To: The Secretary,
Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

I am writing in opposition to the Land Mobile Communications Council's proposal to re-allocate the 420-450 MHz and 440-450 MHz frequency spectrum to commercial, private, land mobile applications. Instead, I ask that the Commission change the Amateur allocation from secondary to co-primary with the U.S. government. Prior to the Cold War era, the Amateur Radio Service was a primary status user of these frequencies. With the tremendous success of the modern "no code" Technician license and the high growth of Amateur UHF operations, now is the time to restore Amateur Radio's historic primary status within the 420-450 MHz band.

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

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

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

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:

- Westside Amateur Radio Club, 1994 Northridge Quake
- The Red Cross, Santa Monica Chapter, 1994 Northridge Quake
- The City of Santa Monica, 1994 Northridge Quake
- The City of Malibu, fires and floods
- The City of Los Angeles, 1992 Civil Disturbance (Riots)
- The Red Cross, Los Angeles Chapter, 1992 Civil Disturbance (Riots)

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,



David Dobrin, KD6AOF
10176 Swallow Ave
Fountain Valley, CA 92708

May 17, 1998

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

Re: **RM - 9267**

Dear Commission:

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

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,

Hom Yu Chu
KQ6EF
5-15-98

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**Edgewood
Amateur
Radio
Society**

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W6NRY · 447.300-

SERVING THE PUBLIC SINCE 1957

May 19, 1998

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

Ref: Petition RM-9267

Dear Commission:

I am a licensed Amateur Radio operator and a member of the Edgewood Amateur Radio Society in West Covina, California. I would like to state my strong opposition to RM-9267 as proposed by the Land Mobile Communications Council.

Our club has a long history, over 40 years, of being dedicated to disaster and emergency communications. The use of the 70 cm Amateur Radio band is critical to our support of Red Cross Disaster communications in West Covina and also to assisting thousands of motorists each year with highway emergencies via our communications system.

The Edgewood Amateur Radio Society maintains an important repeater on 447.300- MHz on Johnstone Peak that services all of the Los Angeles basin. This repeater system allows our club members to assist with many public service events throughout the year. Like all of our repeater systems, it continues to be an emergency resource to the community, and at no cost to the tax payers, supported completely by the membership of our club.

Our club also maintains an vital VHF repeater system that assists the public, on a daily basis, with highway type emergencies. This dual-site system, W6FNO, is linked on the 420 MHz to 430 MHz band and allows radio coverage over much of Southern California. Year-after-year, a team of licensed hams is handling over 4000 calls, aiding the motoring public through the use of the W6FNO repeater. The effectiveness of this system would be greatly impaired by interference from the land mobile users under RM-9267. A serious loss to public service in our area.

RM-9267 puts 420 to 430 MHz and 440 to 450 MHz in grave jeopardy. The technical language in RM-9267 does not give any viable solutions to the very likely problem of interference between the proposed Private Mobile Radio Service, as the primary user, and the long standing use by Amateur Radio as a responsible secondary user. Such RF interference would cause a loss to our club operations that could never be replaced. Please do not approve this misguided petition.

Sincerely,



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