

DOCKET FILE COPY ORIGINAL

<http://www.arrl.org/wlaw/1998-arlb032.html>

5/26/98

Battle Creek, mi.  
May 26, 1998

RM 9267

Dear Sirs:

I seriously doubt the wisdom of proposal RM 9267 as offered by the lmcc group.

I have been amateur radio operator for over 40 years (K8RWX) and would hate to see the 440 Bands integrity sold out in this fashion. This band has much Public service use here in the area. We have weather alerts. Ares drills etc. We also have installed a repeater (443.95 mhz.) I myself also engage in Satellite Communications

The items listed above along with many more have engendered quite an expense by the local Hams. My satellite communications alone has been quite expensive.

Thank you for your time Gentlemen.

Respectfully, John J. Kirkpatrick  
173 Lacey Ave.  
Battle Creek, Mi.

49017  
*John J. Kirkpatrick*

of Copies rec'd  
CODE

4  
130  
OET

**In response to RM-9267**

DOCKET FILE COPY ORIGINAL

26 May 1998

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

Dear Sirs:

I am writing you regarding RM-9267. As an amateur radio operator for nearly 25 years, I am very concerned about the Land Mobile Communications Council (LMCC) initiative where they are requesting reallocation of much of the current amateur 70-cm. band. As the President of a local 100+ member amateur radio organization and on behalf of the Dulles Amateur Radio Group in Northern Virginia, I want you to know how vital the entire amateur radio 70cm. band is to our volunteer public service work.

Last fall, forty four members of the Dulles Amateur Radio Group and the Sterling Park Amateur Radio Club teamed up and supported the movement of patients from the former Loudoun Hospital Center to its new facility in the Lansdowne section of Loudoun County. We used the amateur radio 70cm band extensively to provide this support. Inside the new Hospital building, there were areas that 2 meters would not cover but the 70cm band would work fine. The Hospital officials were very impressed with the amateur radio support and we are discussing placing a new 70cm amateur radio repeater at this new Hospital facility to support mass casualty and disaster communications in the Loudoun County, VA area. The 70cm band is critical to our plans and to the members of the Dulles Amateur Radio Group.

Please do not allow this LMCC organization via their RM-9267 to strip the amateur radio service of one of the most valuable and popular amateur bands. Amateur radio operators provide public service support literally thousands of times each day all across the United States using the 70cm. band and the impact of this bands loss would be enormous. If the needs of the LMCC are valid and justified, I hope the FCC will find another means to support their radio band needs without devastating the amateur radio service, a service that is critical to the United States in times of natural disasters and other serious mass accidents that are played out daily on the evening news. Your consideration of this plea not to allocate the amateur radio service's 70cm band to this group is appreciated.

Sincerely,



Michael E. Weber WB8RDN  
President, Dulles Amateur Radio Group  
113 Evergreen Street  
Sterling, VA 20164

No. of Copies rec'd

044

CODE

09T

DOCKET FILE COPY ORIGINAL

JOHN H. RICE  
P.O. BOX 453  
SAN PEDRO, CA 90733

RECEIVED  
MAY 29 1998  
FCC MAIL ROOM

Federal communications commission  
Secretary of the FCC  
Washington, D.C. 20554

RE: RM-9267

Dear Commission:

I am an amateur radio operator. I am writing in concern of RM-9267, the proposed rule making for land mobile service.

As you are aware, the amateur radio service is currently sharing the 440mhz band with the U.S. government. This has worked well and both parties have lived comfortably with each other.

RM-9267 proposes that the land mobile service would become primary instead of the U.S. government and the Amateur radio service would remain secondary. I feel that this would probably not work, as frequency space is precious and also I fear that the land mobile service would eventually claim use of the entire spectrum.

THANK YOU FOR YOUR CONSIDERATION

*John H. Rice*

No. of Copies rec'd 5  
List ABCDE

OET

DOCKET FILE COPY ORIGINAL

JOHN H. RICE  
P.O. BOX 453  
SAN PEDRO, CA 90733

RECEIVED  
MAY 29 1998  
FCC MAIL ROOM

F.C.C.

Washington DC, 20554

Dear Commission:

As a licensed Amateur Radio operator and would 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.

*John H. Rice*

No. of Copies rec'd 0+4  
LIST ABCDE 0ET



bandwidth television emissions, such as C3F. Over the last ten years, Amateur Television has experienced explosive growth. The availability of high quality, low cost video equipment has put television within the reach of most any ham. As a result, it is being used more and more for public service activities where pictures are important. Examples of this are parades, races, and other events that cover a wide area. The use of television lets those involved actually see what's going on in the event of a problem. This greatly facilitates selecting an appropriate response. This is even more important in light of the fact that even good operators may have problems verbally communicating the exact nature of a situation when things get out of control.

Virtually all television emissions used in this band are of the common NTSC AM analog type (C3F). This is because this emission is relatively spectrum efficient (6 MHz), and the equipment is not hard to build or manufacture. It also allows use of common consumer cameras, VCR's, monitors and TV sets as input and output devices. Video compression technology will eventually help shrink the spectrum requirements down somewhat, but the high performance compression technology required for full-motion video will not be affordable to most amateurs for a few more years.

The size of the 70 cm band also allows the use of Amateur TV repeaters. Analog TV signals require a significant amount of power for good video signal-to-noise ratios. The high power, extremely linear amplifiers for this type of service are difficult and expensive to construct. Therefore, the power output tends to be lower than what is normally required for this type of operation. (2-10 watts is typical for most commonly available Amateur TV gear.) Since most of this communications is point-to-point, high gain antennas help extend the range of these systems. However, point-to-point communications

is not always practical.

Amateur TV repeaters allow the extension of range of these TV systems, and allow a wider area to be served without the use of multiple or rotatable high-gain (And therefore large and expensive) antennas. The repeater is also usually designed to run at much higher powers (100W or more) to simplify receive antenna requirements. The problem with Amateur TV repeaters is that there has to be a fair amount of separation between transmit and receive frequencies so that the signals will not interfere with each other. The closer the transmit and receive frequencies are to each other, the harder it is to design a filter that will prevent interference. Commercial TV broadcasters have to pay tens of thousands of dollars for such filters when they are required. Few, if any hams could afford such a filter. Therefore, having a wide band of frequencies available to separate the repeater's transmit and receive frequencies is essential for the proper working of an Amateur TV repeater. The present 70 cm band provides enough frequency separation to make Amateur TV repeaters practical. The reallocation proposed would make it impossible.

The 420-430 MHz portion of the 70 cm band is also popular for control links, especially for controlling repeater systems. The FCC rules mandate that amateurs must have control over their repeater systems at all times. In many cases, the most practical way of doing this is a control link on a frequency removed from the repeater's main transmit and receive frequencies. Since there is not much commercially made radio equipment available for this portion of the band, it affords a measure of security for users of these links. They have to build, or modify existing equipment to work at these frequencies. With the increasing amount of illegal radio operators in all services, having a relatively 'secure' control link is much appreciated by a repeater owner.

Now, let's look at the other portion of the band the LMCC would like to reallocate for

Land-Mobile use: the 440-450 MHz band.

The 440-450 MHz portion of the 70 cm band is home to thousands of repeater systems all across the country. Only the Amateur 2 meter band (144-148 MHz) has a higher density of repeaters. This band, along with the Amateur 222-225 MHz band, have become the areas of rapid growth for the hugely popular use of repeaters by amateurs. In fact, here in Rochester, NY, it is becoming difficult to find a frequency in this band segment where one might put a new repeater. One repeater guide I have lists 13 systems in this band located just in this area alone, and I know of at least two more that aren't listed. There are more 70 cm repeaters in the Rochester, NY area than there are on 6 meters, 2 meters and 222 MHz combined!

The most important reason for these repeaters to exist is for public service and emergencies. This type of thing can range from a footrace to an auto accident to a weather disaster. Amateur Radio operators have demonstrated time and time again their unique ability to provide communications when no other system can. A few years ago, an ice storm devastated this area. The amateur repeaters were one of the few radio services that stayed on the air. Many public service radio systems stopped functioning. More recently, during the series of ice storms that hit the East Coast last winter, Amateur Radio systems were about the only thing on the air. One of the reasons that this happens is that amateur repeaters are often located far away from commercial or government antenna sites. They are constructed with a variety of different components, and equipped with unique alternative power systems. Because they are buried in the infrastructure of the community, and at locations away from commercial and government users, the chances of their staying on the air in times of disaster are better. Furthermore, the system's owner is uniquely

qualified to quickly perform any maintenance necessary to keep the system operational. Last but not least, the repeaters are often very busy with casual traffic when not needed for more important uses. They log many more hours of key-down time than most commercial or government repeater systems. Constant use is the best reliability test there is.

The local network of repeaters is so important in this area that the local nuclear power plant uses Amateur Radio as its primary communication means in the event of an accident.

Therefore, reallocation of the 440-450 MHz portion of the 70 cm Amateur band would be nothing short of a disaster. Let's examine why.

First of all, there is no practical way to share these frequencies with land-mobile services. Undoubtedly, the PMRS would utilize the same type of wideband FM (F3E) that amateurs and most other land-mobile users have used for years. Although not as spectrum efficient as some of the newer technologies, FM remains popular because it gives a good signal-to-noise ratio, tends to lock out weaker interfering signals, and is cheap and easy to implement. However, two FM users cannot share the same frequency at the same time in the same area. Two signals of approximately equal strength obliterate each other to the point where neither one is intelligible.

Commercial users would find it intolerable to share frequencies with amateurs. Hams might be able to work around commercial users, but only if the number of commercial channels was low enough that it would not be cost-effective to offer a service.

Furthermore, no precedent exists for this type of sharing in the Amateur Radio service. And, despite the presence of numerous repeaters, hams still use various other modulation techniques in this portion of the band. This includes wideband techniques that would cross numerous frequency 'channels'. (Amateur radio operations are not restricted

to frequency channels like commercial and government uses are. They can go anywhere in the band as long as their emissions fall within the band edges, and they share the band with the other users there. Hams are not allowed to 'own' frequencies.) Such experimentation could become very tough to do if the band is broken up with blocks of commercial users. One wide bandwidth service that would be adversely affected is Amateur TV. In some areas, especially where 420-430 MHz is not available due to our agreements with Canada, Amateur TV traffic takes place in the low end of this band segment. Another area that would be affected is those working with high speed data links. These data links take up a lot of bandwidth. Hams want to be part of the National Information Infrastructure with advanced packet radio systems, and limiting or chopping up the band would interfere with this.

Moving amateur systems to nearby bands would not work well. First of all, the 430-440 MHz portion of the amateur 70 cm band is not a good relocation place for repeaters. This section of the band is used by satellite and weak-signal VHF operators. Bouncing signals off the moon is also done here (called Earth-Moon-Earth or EME). All of these services require a very quiet radio noise floor to be successful. These areas also represent where the real research in radio technology is taking place. Crowding this portion of the band with a bunch of repeaters would raise the general noise floor and make these weak-signal operations very challenging. Direct interference with these operations would also undoubtedly result. You also could not locate repeaters in the 435-438 MHz segment at all, because satellite operations there would be rendered useless. These satellite bands are also protected by international agreements.

In most localities, 2 meters is already full of repeaters. 222 MHz repeater slots are still

available in many places, but could not begin to accommodate the influx of repeaters that would have to change bands. Many systems would have to relocate to the 1.2 GHz band, where equipment is still very expensive.

The replacement spectrum offered by the LMCC would not help alleviate the problem. They recommend 1390-1395 and 1427-1432 MHz. That's only 10 MHz of spectrum to replace the 20 MHz we are losing. Furthermore, neither segment could even hold a single Amateur TV channel, unless expensive digital compression techniques are used.

Equipment for this band would not be readily commercially available (At least at first) and would be costly to build. (Net result: only builders and experimenters would use these new frequencies until you could buy radios off the shelf. This in practice has taken many years to happen on other bands.) Last but not least, this spectrum has different propagation properties than 420-450 MHz. Although the differences may not be great, it still would not be an identical replacement.

One of the worst aspects of this request is what it would cost amateur radio operators who use the 70 cm band. I happen to be a heavy user of the band, and have always used it preferentially to other VHF bands. Two of the three radios I own for this band would be useless or require heavy modification after losing this spectrum. For me, that's a net loss of \$600. The third radio, designed for 430-440 MHz weak signal work would continue to be useful, but more interference and higher noise floor would render it less effective.

Repeater owners would be in an even worse plight. A friend of mine puts the replacement cost of his 70 cm repeater at \$5000. Systems like this represent a substantial investment of time and money over several years, and would be obsolete overnight. Radios for the replacement spectrum would be expensive, and sell slowly until the band caught on.

Experience with other bands indicates that this can take years.

And, last but not least, taking away most of an important band would severely interfere with the ability of the amateur to provide public service and emergency communications. It will take years of time and effort (and expenditure) on the part of hams to return to the status quo after losing a large portion of spectrum, especially in a popular VHF band like 70 cm. Look what happened when 2 MHz was removed from the 220 MHz band. It devastated the band. Only slowly are users starting to rediscover this band, and the weak signal people are leading the way. Commercial equipment availability for this band is still not as good as before we lost this 2 MHz. And if we lost either segment of the 70 cm band, you can bet that equipment manufacturers would abandon the band like rats off of a sinking ship. The availability of commercially-made equipment generally encourages use of a band. It also helps our economy when hams buy radios.

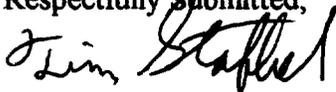
The most important concept that should be remembered here is that most hams do not have large amounts of money to spend. We do what we do as volunteers, at our own expense. We make no money with our radios. When we are forced to change frequency, we have to do it at our expense. We cannot afford to buy new radios every time somebody decides that a portion of our spectrum would nicely serve their (usually) profit-motivated desires. We also do not have the monetary resources to mount a major legal battle against our foes. We depend on the FCC to protect Amateur Radio, as it is in the public interest for them to do so. The spectrum entrusted to Amateur Radio is a national treasure, like our National Park System, and should be treated as such when somebody comes along who wants it for their own ends.

## **CONCLUSIONS**

The request of the LMCC to reallocate 420-430 MHz and 440-450 MHz should be denied. They should be encouraged to use the spectrum available at 1390-1395 MHz and

1427-1432 MHz. The structure of these two bands lends itself well to both simplex and repeater type operations. Using conventional FM technology, it would be easy to get nearly 500 channels in these two band segments. More could fit if the equipment used in these bands is required to have carefully controlled deviations on transmit and tight front ends on receive. Amateur experience has shown that for line-of-sight applications typical of such a services as PMRS, that our lower microwave frequencies have generally good propagation. Performance should be almost as good as the frequencies they wish to take from us. Higher frequencies also mean smaller antennas and smaller radios, something that consumers of these radios generally desire. It has also been shown that good communications can often be acheived at these frequencies with less RF power than at lower frequencies. These radios would be more expensive to make than radios designed for 70 cm, but commercial enterprises generally have the resources to purchase such radios. Further proof of the viability of this recommendat on is that the LMCC is asking for several nearby allocations in this rulemaking, and that they recognize the 'net constriction' that reallocating portions of 70 cm band would have to Amateur Radio. Let's not see that 'net constriction' occur.

Respectfully Submitted,



Tim Stoffel, NS9E  
311 Cole Ave.  
Rochester, NY 14606-3808  
lionlamb@servtech.com

RECEIVED

MAY 29 1998

FCC MAIL ROOM

124 West Lockwood Avenue  
Suite #28118  
Webster Groves, Missouri - 63119  
20MAY98

Office of the Secretary  
Federal Communications Commission  
1919 M Street, NW  
Washington, District of Columbia - 20554

DOCKET FILE COPY ORIGINAL

Subject: RM-9267 - Objection to the Land Mobile Communications Council's  
Petition for Rulemaking

Dear Mr. Willaim Kennard:

My wife Erma Ruth Yanko - NOVGG and myself are concerned about the effects of the petition for reallocation of parts of the 70cm - 440mc Amateur Radio Service by the Land Mobile Communication Council (LMCC). The LMCC has asked you, the FCC to immediately reallocate 420 to 430 Mc and 440 to 450 Mc from the federal government to the Private Mobile Radio Service (PMRS) on a primary basis. Amateur Radio now enjoys the use of 420 to 450 Mc on a secondary basis, and the 430 to 440 Mc segment is an international allocation. The 70-cm band is the second most popular of the hobby's VHF/UHF allocations, with substantial FM repeater and other operation in the 440 to 450 Mc segment and a variety of uses in the 420 to 430 Mc segment.

This band provides the backbone of our local public service communications effort. Most of the control and linkage of many of the areas' club and individual two meter, 70cm and above, repeaters reside on these band. Much donated time, equipment and monies has been spent on maintenance and design. Voice and electronic data, mobile and fixed, satellite communications, moonbounce, even television - the list of present amateur uses is a long one, and of future uses could be even longer. The band is used for extended-range terrestrial operations calling for extremely sensitive receivers and high levels of effective radiated power. The bands are currently shared with the amateur radio on a secondary basis. They are currently shared with a primary user who has caused or received minimal interference with amateur radio activities, but the LMCC does not offer such assurances. We have experienced what happens when sharing the frequencies with similar services with our 220mc frequencies, having to use notch filters to remove the interference.

Apparently, we did need to explain all this to the little LEO (Low Earth Orbit Satellite) industry representatives, so we did just that - bring it up at the meeting and IUP letter on May 1996. We also explained that we had to regard the matter as extremely serious. No one with the slightest background in radio communication could possibly believe that a mobile-satellite service could be introduced into either band without disrupting existing and future amateur operations. Therefore, we said, we did not receive assurance that they would be taken off the list of candidate bands by the deadline, we would have no choice but to bring the matter to the attention of the entire membership.

No. of Copies rec'd 4

ABCODE OET

RECEIVED

2

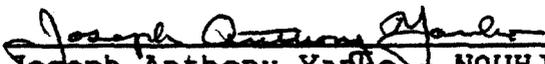
MAY 29 1998

FCC MAIL ROOM

But, the short time, explained by your Mr. William T. Cross, at the Dayton, Ohio Hamvention, as being normal for response, limited the dissimulation of information on the petition. But, never the less, in the time allotted it has not been met favorably with the Amateur community. With HR.3572 being introduced, bipartisan by Representatives Bilbrakis and Klink on 27MAR98, to afford a measure of protection to the these needed frequencies, and the continuing encroachment on the Amateur Bands.

Please find this letter as we being interested in the negation of the HR.9267 petition.

Regards:

  
Joseph Anthony Yanko - NOUHJ

  
Erma Ruth Yanko - NOVGG

cc: 4 copies FCC  
file

RECEIVED

MAY 29 1998

FCC MAIL ROOM

DOCKET FILE COPY ORIGINAL

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 linkin 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.

KD6CFH CARL DAVIDSON  
PHONE 818 780 5054  
16212 HAMKIN ST  
VAN NUYS, CA. 91406

No. of Copies rec'd  
ABODE

4  
OCT

ORIGINAL

RECEIVED

MAY 28 1998

RECORDS ROOM

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D. C. 20554

DOCKET FILE COPY ORIGINAL

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

TO: The Commission

**COMMENTS TO**

Petition for Rule Making  
Submitted by the  
Land Mobile Communications Council

FROM

**PATRICK A. STEWART, KA6P**  
27886 Sarabeth Lane  
Laguna Niguel, CA 92677  
patrick.a.stewart@boeing.com

25 May 1998

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

024  
OET



relative to the two referenced reports, it is considered a "stretch" by any unbiased individual to go so far as to hold the Commission as causative in the implied injustices. The Petition is without substance relative to implied cause.

4. The Petition leads the Commission to believe that the LMCC constituents' use of spectrum is without financial gain, in that it is not for commercial use and "the ability to communicate in times of crisis can save lives within the company and the *community as well*". The strong theme throughout the Petition plays on the "apparent" ability and willingness of the LMCC constituents to provide "public service" communications to "the general public". As much as it makes for an interesting story, the fact remains that the "companies" will be sufficiently busy in times of crisis taking care of their own, and even with the "good intent" to provide for the community, will find themselves incapable due to internal demand. This theme should not be considered an *offset* to the value that Amateur Radio brings to every community in our country.

5. The Petition uses several true-life scenarios as basis for increased spectrum, citing loss of life due to misunderstood communications that was brought about through shared frequencies. As much as I can understand the loss experienced by the families involved, the Petition attempts to use these facts (and loss of life) as a basis of support for their needs. As it is with all communications, *clear and concise* is key. Failure to follow good communications practices in any high-risk environment can eventually lead to mishap, and resultant loss of life. Co-sharing of frequencies, in itself, is not a contributing factor. Generating emotion on the part of the reader can sometimes yield favorable results, however, I'm optimistic that the Commission sees these antics for what they are.

6. Section III of the Petition clearly points out that "there is a drastic shortage of spectrum". That doesn't come as a surprise to anyone who has been involved with radio communications for any length of time. The LMCC does a great job of pointing out the technologies that should help alleviate the congestion experienced by PMRS licensees, yet they seem to believe that it can't happen soon enough. Trunking and moving to "narrower channels" should all be considered the resolution to most of the identified problems. Falling back on "packing density increase will not be attained for decades due to the need for a reasonable transition period for existing equipment" seems to diminish the *apparent urgency* stated throughout the Petition. If the urgency is real, it should follow that the licensee is very motivated to solve the problem. The equipment is available, and all that remains is the *need* to transition and a frequency coordination process to allow the transition.

7. "Refarming will provide limited relief" cannot be a statement that brings much comfort to the Commission as we strive to bring our communications resources to their full potential. If the statement is true, then it is long overdue that we abandon our ongoing efforts. Believing that the statement is intended to create a false sense of urgency, I would hope that we remain on our current course. LMCC would have the Commission believe that PMRS should exempt from the current direction of the communications community, and that nothing short of increased spectrum can solve their problems. Unfortunately, the same could be stated by anyone with some basis. LMCC, on behalf of the PMRS community, should not be accommodated in their request. There is a plan in-place to help solve the issues identified. The PMRS community should be giving serious consideration to taking advantage of technology immediately.

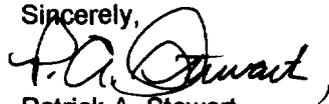
8. The LMCC recommendations are unacceptable as presented in Section V. Specifically, their immediate needs being resolved by *taking* 420-430 MHz, paired with 440-450 MHz with PMRS as Primary (Amateur Radio as Secondary) cannot be allowed. Currently, Amateur Radio is the Secondary user of that portion of the spectrum, sharing with Government (Military) as the Primary user. This part of the spectrum is the second busiest Amateur Radio VHF/UHF band in the country. Amateur Radio public service activities, whether they be during an emergency or just supporting the local community in activities, rely heavily on repeaters and simplex operations in this portion of the spectrum. Amateurs have invested millions of their own dollars, to put in place repeater systems, remote base equipment, and links for interconnect. Amateurs

have expended hundreds to thousands of dollars of their own money to own equipment that allows them to support their communities in time of emergency. This valuable national resource (Amateur Radio, 420-450 MHz) cannot be eliminated or moved without *major* consequence to our communities.

9. I have been involved in Amateur Radio since 1963. I have placed repeaters in service for the well-being of the community. I operate in the band being requested by LMCC, and with an unbiased look at the facts, I cannot see more value to the community than that presented by the current use of the spectrum in question. The Amateur Radio Secondary user status is incompatible with PMRS as Primary. Whereas, the current allocation brings the best to both current using services. Please give consideration to the facts provided in this Comment, and feel free to inquire should additional information be required.

Thank you for your consideration in this important matter.

Sincerely,

 KAGP

Patrick A. Stewart  
27886 Sarabeth Lane  
Laguna Niguel, CA 92677  
(949) 360-4384

RECEIVED

MAY 29 1998

FEDERAL COMMUNICATIONS COMMISSION

DOCKET FILE COPY ORIGINAL

212 Federal Lane  
Huntsville, AL 35811

May 25, 1998

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

REFERENCE : RM-9267

Dear Sir:

I was recently advised by members of our local amateur radio community that the Land Mobile Communications Council (LMCC) has requested that portions of the 420 to 450 MHz band be reallocated to private mobile operations. I am writing to you as a licensed amateur radio operator to express my concern and opposition to this proposition.

In addition to use of these frequencies for personal pleasure, local amateur radio operators are heavily involved in public service activities there. I am seriously concerned that any reallocation of these frequencies to the private sector would eventually result in complete loss of them for amateur radio purposes. This would be a great loss, not only for personal communications, but also for service activities such as severe storm spotting and support to local Red Cross and medical rescue groups.

I respectfully request that you find other alternatives to reallocation of these frequencies for private mobile operations.

Yours sincerely,



Jesse William Foreman, Jr.  
KF4DIM

No. of Copies rec'd 5  
A B C D E OET

RECEIVED  
MAY 2 1993  
COMMUNICATIONS SECTION

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

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

To: The Secretary,  
Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

I am writing in opposition to the Land Mobile Communications Council's proposal to re-allocate the 420-430 MHz and 440-450 MHz frequency spectrum to commercial, private, land mobile applications. Instead, I ask that the Commission change the Amateur allocation from secondary to co-primary with the U.S. government. Prior to the Cold War era, the Amateur Radio Service was a primary status user of these frequencies. With the tremendous success of the modern "no code" Technician license and the high growth of Amateur UHF operations, now is the time to restore Amateur Radio's historic primary status within the 420-450 MHz band.

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

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

No. of Copies rec'd  
12345678

045  
027

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:

Several Agencies within Sonoma County. Our repeater group provides emergency communications capability to the Sonoma and northern Marin County coastlines via a 420 link. We also provide emergency communications on a 440 repeater for the City of Santa Rosa. Several volunteer amateur radio operators provide critical communications assistance to these agencies in the event of natural disasters such as floods and earthquakes utilizing these 420 Mhz. Links and 440 repeaters.

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,

A handwritten signature in cursive script that reads "Jeff Foster".

Jeff Foster, KD6RC  
1716 La Caida Court  
Santa Rosa, CA 95409

May 25, 1998

EX-107-100

MAY 8 1993

LOG MAIL ROOM

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, DC 20554

In the Matter of

Proposed Reallocation of 420 Mhz to 430 Mhz  
and 440 Mhz to 450 Mhz From the Federal  
Government to the Private Mobile Radio  
Service

DOCKET FILE COPY ORIGINAL

RM 9267

I am commenting as the President of the CE-Bar Volunteer Fire Department Incorporated, sole contractor for Fire Suppression, Emergency Medical and Rescue Services to Travis County Emergency Services District 10 in an area west of Austin, Texas.

The federal government shares the effected spectrum with the Amateur Radio Service, which is a "secondary" user. The Amateur Radio Service has a long history of public service in times of emergency and often uses channels in the targeted spectrum for emergency purposes. The current uses of this spectrum, by the federal government, make it possible for radio amateurs to provided these emergency public services on these shared frequencies without significant interference to either user.

Amateur sharing of this spectrum with the Private Mobile Radio Service, as proposed in the petition, is not practical. The technologies proposed for use by Public Mobile Radio Service would interfere with the use of these frequencies for emergency support of fire fighting and emergency medical services, as have been provided by radio amateurs on their repeater systems in the 440 to 450 Mhz band, here in western Travis County, Texas. Other radio amateurs have provided

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

024

021

**Comment on RM 9267  
CE-Bar Volunteer Fire Department**

local officials with live video of emergency situations and public events using television channels in the 420 Mhz to 430 Mhz range.

These frequencies, and the volunteer amateur radio operators who use them, provide an emergency backup link to local government, the Red Cross, the National Weather Service and others essential agencies in emergencies. I understand that the building and maintenance of these radio systems requires a considerable investment of both money and effort by concerned, volunteer radio amateurs. As a Volunteer Fire Fighter, I applaud their efforts and urge the Commission to support them with continued access to essential radio frequency resources.

The services provided by radio amateurs on these frequencies are a valuable asset to the public safety agencies in our area. I do not believe the proposed re-allocation of the 420 Mhz to 430 Mhz and 440 Mhz to 450 Mhz ranges is in the best interest of the public, the public safety community or amateur radio.

**I urge that the Commission not re-allocate the Amateur Radio Service frequency bands 420 Mhz to 430 Mhz and 440 Mhz to 450 Mhz as proposed in RM 9267.**

Cordially,

A handwritten signature in black ink, appearing to read "Glen Reid". The signature is fluid and cursive, with the first name "Glen" written in a larger, more prominent script than the last name "Reid".

GLEN REID

President,  
CE-Bar Volunteer Fire Department Incorporated  
2302 San Juan Drive  
Austin, TX 78733

5/25/98