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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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MAY 29 1998
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In the matter of	)	
Proposed Reallocation of 420	)	
To 430 Mhz and 440 to 450 Mhz	)	RM 9267
From the Federal Government to	)	
The Private Mobile Radio Service	)	

My name is Raymond Pillow and I hold a Advanced Class Amateur Radio License. I am also a member of the Roanoke Valley Amateur Radio Club in Roanoke, Virginia. The members have financed, via club dues as well as personal donations, a repeater operating on 442.500 Mhz located on top of Mill Mountain in Roanoke VA. This repeater is also linked via 440 MHz to another repeater operating on 146.985 Mhz located on Poor Mountain near Roanoke. This repeater is also operated via club dues and personal contributions of club members and local Amateur Radio Operators (Hams). These repeaters are used mainly for hobby communications but are also used to call emergency services for accidents, fires, etc. when regular telephone service is unavailable. They are used as well for public service regularly to provide communications for agencies such as the March Of Dimes Walk-a-thon to assist the local emergency services wherever needed. They are also used during floods, snow storms, hurricanes and any other time of emergency. While the repeaters are financed by club dues and contributions our personal radios and antenna systems are the responsibility of each individual. It is my opinion that the volunteer time and expense of each individual is a very important part of the local community and will be jeopardized if reallocation of these frequencies is allowed.

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While this letter is about one club and one local community, there are countless other clubs across the country lending their time and equipment to their communities as well. Please consider this very important use of these frequencies and do not allow reallocation of this well used Ham band. Thank you for your consideration.

Sincerely,

Raymond Pillow

Raymond Pillow
May 25,1998

Raymond V. Pillow
4240 Harborwood Rd
Salem VA 24153-8574

Before the

Federal Communications Commission DOCKET FILE COPY ORIGINAL

Washington, DC 20554

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

1. Being a Registered Professional Engineer in Virginia and D.C., an amateur radio operator for 35 years, and possessing 25 years of experienced operation in the 420-450 MHz using amateur television (ATV), I am writing to strongly oppose the LMCC Petition for Rule-making.

2. Although government Military Radar Radiolocation has primary allocation for the 420-450 MHz band, amateur radio is currently the main user of these frequencies across the United States. The rule making would drop amateur radio to tertiary status forcing amateur operations off most of the band. This, in turn, would result in a) undue financial burden on the individual amateur radio operator since expensive equipment would be rendered useless, b) significantly reduced ability to serve the public interest by being forced to use frequencies with poor propagation/range characteristics, and c) curtail experimentation with advanced techniques such as digital high-definition television in a band amenable for cost-effective transmission and reception.

3. Amateur television, which is used for public service events like disaster drills, tornado watches, emergency response groups, and remote monitoring, makes primary use of the 420-450 MHz band. It is the lowest frequency permitted by the FCC. Higher frequencies are not as desirable

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since equipment is much more expensive, a higher degree of technical expertise is required, and propagation conditions are much worse. To make ATV operations effective over long distances using relatively inexpensive equipment, amateur television repeaters have been used throughout the United States for well over 25 years. The majority of these systems make use of both the 420-430 and 440-450 band segments to have sufficient bandwidth and 13+ MHz channel spacing to duplex the transmit and receive signals from a central, high altitude location. The proposed rule making would eliminate ATV repeaters from the band and, in turn, render ATV ineffective. It would also make useless millions of dollars of amateur radio equipment now in the hands of individual operators nationwide.

4. In the Washington D.C. area, amateur television enthusiasts belonging to the Metrovision ATV club have experimented for 10 years with using an ATV repeater output in the 900 MHz to examine other options to the 420-450 MHz band. The results have clearly shown that the poorer propagation conditions and more costly equipment required at these higher frequencies--resulting in very limited usage--clearly has demonstrated that these higher frequencies are not practical. Specific problems observed at using frequencies above the 420-450 MHz band were:

a) 10 db or more additional path loss plus added attenuation due to summer foliage.

b) 2.3 db or more additional transmission line loss per 100 feet.

c) higher cost of solid-state devices

d) critical nature of components, component placement, and circuit specifications.

e) additional antenna elevation required to compensate for signal attenuation in suburban terrain may also conflict with local restrictive tower ordinances.

f) potential health hazards to users of microwaves

g) exceedingly high cost of test equipment for amateurs, such as test generators.

5. Forecasting the time required by an advancing technology to enable the move to a higher amateur frequency becomes a matter of speculation. Amateurs have no objections to experimenting with microwaves; particularly with cross-band repeaters as has been done in the Washington area. I am sure that those groups possessing the unique experience, money, and desirable geographic and propagation environments will be able to make great strides. However, it is still far in the future where microwave operation can achieve parity with that of 420-450 MHz in amateur television applications from a cost and performance standpoint.

6. I fully recognize the desirability by the LMCC to utilize the amateur radio bands. Nevertheless, the public interest would best be served by diverting these commercial interests to the myriad of unused commercial UHF channels. In every U.S. locality, literally hundreds of MHz is underutilized. The Commission has already set precedent by previously allocating channels 14 thru 20 for land mobile, and 69, 71, and 78 for ship to coast communications.

7. In summary, I believe this rule making proposal could have deleterious effects on hundreds of thousands of amateur radio operators nationwide. It should be rejected.

Respectfully submitted,

Bruce J. Brown, WA9GVK

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5943 Squirrel's Nest Lane
Cincinnati, OH 45252

Tuesday, May 26, 1998

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

RE: RM-9267

Dear Sir or Madam:

This letter is a comment on RM-9267 submitted to the Federal Communications Commission (FCC) as an original and four copies.

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

As a licensed participant in the ARS, I have used those UHF frequencies allocated for the ARS to assist stranded motorists in remote areas of Hamilton County to obtain emergency road service in my community. Amateurs in the Miami and Ohio Valley areas heavily utilize these UHF frequencies. And their usage continues to increase as more potential sponsors of FM repeaters come into the ranks of the Amateur Radio Service and find the allotted VHF frequencies have no room for additional repeater assignments.

In the Ohio, Indiana and Kentucky area the W8PRH repeater system utilizes frequencies in this UHF spectrum to link more than 40 receivers to numerous repeater transmitters operating in simulcast mode for the tri-state 145.19 wide area system. If these UHF frequencies were removed from the ARS, it would be an extreme financial hardship for the amateurs in our community to be forced to relink the system using any other frequency spectrum. In fact, I am sure this would precipitate the end of this unique Amateur Radio Service resource serving the tri-state area.

Many of the existing VHF FM repeaters in the Ohio Valley also use remote receivers to enhance their coverage area. For example, the Cincinnati FM Club's 146.880 MHz repeater is linked to three remote tri-state receiver sites. A public service mission of the FM Club is to provide severe weather warning service to the tri-state community through a coordinated effort with the National Weather Service (NWS) located in Wilmington,

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Ohio. When a severe weather system is detected by the NWS, local amateurs are notified. They provide a licensed amateur radio operator and amateur radio equipment at the Wilmington location under the FCC license W8NWS. The control operator takes control of the repeater system to coordinate requests from weather service personnel for on-site verification by amateurs of severe weather conditions. These conditions shown by doppler radar systems are monitored at the Wilmington site. The UHF repeater links utilized by the FM Club system permit trained amateur weather observers located in or near the storm area to operate with handheld equipment and thereby provide superior tracking mobility and yet maintain reasonable personal safety for the amateur operators in the storm field as they attempt to confirm the radar observations. Amateur operators' weather observations are often included in the weather advisories provided to the general public during severe storm conditions. In addition to the free public service provided to the NWS and the general public, the Amateur radio operator's observations help the NWS to advance the science of weather forecasting through the verification of weather radar observations by trained amateur radio weather spotters in the field.

We respectfully request that the Commissioner deny the requests for frequency allocations contained in RM-9267.

Sincerely,

Jon W. Banning

Jon W. Banning, N8PES

Jon W. Banning for Kami J. Banning

Kami J. Banning, KC8IBA

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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MAY 29 1998
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In the Matter of

An Allocation of Spectrum for the Private Mobile Radio Services — RM-9267

TO: The Commission

Response to Petition for Rule Making
Submitted by
Bruce William Forsberg, WB6IZG

May 20, 1998

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The following is my response to RM-9267. I am submitting this as an individual and this is my first one so if something is not right I apologize.

Introduction

I am concerned to the impact the implementation of this Petition would have on Amateur Radio. I have been a Amateur Radio operator for close to 20 years now and have enjoyed it very much. My concerns center around the reallocation of 420 - 430 MHz and 440 - 450 MHz. The two areas that I would like to cover would be the economic impact this would have to everyday Amateurs like myself and more importantly the harmful impact this would have to the diversity of Amateur Radio.

Economic Impact

In my 20 Years as an Amateur Radio operator I have accumulated many pieces of equipment. Listed below is the equipment that I have for the 420 - 450 MHz band.

ICOM IC-4SRA Handheld FM (440-450 MHz) transceiver	$400
75 cm Antenna	$100
Mirage D26 75 cm AMP	$300
PC Electronics Amateur Television Transceiver	$300

This equipment is used to transmit on these frequencies. The reallocation of these frequencies would make these pieces of equipment worthless. This is an investment on my part of $1100. I know that may not sound like much but it is alot to me. Multiply that by 100,000 Amateurs and it has a hugh impact. It will also have a devastating impact on the Amateur Radio equipment manufactures. If we in ham radio can't be sure of what frequencies will be taken away next it will put a halt to Amateur Radio purchases. Why should someone spend money for equipment on 430-440 MHz when LMCC will just want that part as well 5 years from now. We Amateur Radio operators are not like big business where we can pass the cost of new equipment purchases on to the consumer. We must eat the costs ourselves.

Used equipment for these frequencies will also become worthless. Used equipment is mainly purchased by new Amateur Radio operators who are from low income situations or by young people with limited budgets. LMCC suggests in paragraph 78:

> *"Also recognizing that amateur radio service will see a net constriction by the recommended reallocation of 420-430/440-450 MHz, some of this spectrum might be reallocated to amateur service to offset the constriction. This would of course reduce the amount of spectrum reallocated to PRMS but might be of value to speed up net availability of the lower band. For example, 1390-1395/1427-1432 MHz might be allocated to amateur service with 1395-1400/1670-1675 MHz going to PRMS."*

Reassigning new frequencies for which there will be no used equipment will hurt those Amateur Radio operators the most who can afford it the least. Also Amateur Television requires a minimum of 6 MHz so these 5 MHz chunks would not compensate for the loss of this mode.

Amateur Radio Diversity

Another aspect of Amateur Radio that will suffer is its diversity. Amateur Radio has long been known for the many varied operating modes that are available. This is one of the most attractive aspects of Amateur Radio. Reducing the 75 cm band from 30 MHz to just 10 MHz will force some of these modes to be eliminated. Especially the wide band modes such as Amateur Television (ATV) and high speed packet radio. With a shrinking bandwidth one can't justify them existing with the amount of users that would have to be relocated to 430-440 MHz. LMCC claims in paragraph 73:

> *"Amateur applications in the 420-430/440-450 MHz should remain secondary to PMRS"*

I believe that Amateur Radio operators and Big Business can't coexist. Any time we cause even the slightest interference they will not tolerate it. They will simply threaten us off the band or use the legal process which few Amateur Radio operators can afford. The Military has always been a good neighbor and has worked wonderfully with us. But Big Business has too much money at stake and will not tolerate us.

LMCC also states in paragraph 73:

> *"Furthermore, to the extent that new PMRS advanced services are implemented here, equipment availability and technology would benefit amateurs pursuing such applications as compressed video television in the 430-440 MHz band."*

LMCC would have you believe that we will be able to keep our diversity by opening up new technologies. The facts are that most of these new technologies and compression techniques are proprietary in nature and will never be made available to the Amateur Radio community.

Conclusion

Thank you very much for considering my response. I believe that we Amateur Radio operators are a very valuable member of society and to continue to be effective we must be able to keep the frequencies that we operate on.

Respectfully Submitted,

Bruce William Forsberg, WB6IZG
11178 Batavia Circle
San Diego, CA. 92126
(619) 695-1044

JAMES J. BRESHEARS, N6XCR
154 Huntington Dr., Apt. G
South Pasadena, CA 91030

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May 25, 1998

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

Proposed petition: **RM 9267**

Dear Commission:

I have been an licensed Amateur Radio operator for over 10 years now and am so concerned about RM 9267 that I was compelled to write and state my strong opposition to it.

I am an active participant in several ham radio emergency nets, both on the 2 meter band and on the Condor Connection.

The Condor Connection is a network of 15 linked repeaters that provide unsurpassed radio coverage from the Mexican border to above Sacramento, California. What makes this system possible is the linking of the 222 megahertz repeaters on the 70 cm band. All 15 of the repeaters use linking frequencies in the 420 to 430 megahertz band segment. The Condor Connection has provided public relief after several disasters over the last few years, including the 1989 Bay Area earthquake.

My radio is usually locked to the KJ6JY repeater on Santiago Peak, and it allows me instant coverage to most of California in the event of emergency or disaster. Under the proposed RM 9267 the KJ6JY repeater could lose it's link to the hub repeater, N6XKI, and thus the system would be non-operational from my location.

If Amateur Radio became the secondary user to land mobile communications, what technical guarantee is in RM 9267 that would allow ham radio operators, like myself, to continue to provide unique communications solutions, like the Condor Connection, without undue interference to either the primary or secondary user in the 420 to 430 megahertz and 440 to 450 megahertz spectrum? I fear none.

Amateur Radio frequencies are a long-standing national resource that can continue to serve the public in times of need. We, the Amateur Radio operators, ask that you do not approve this measure.

Sincerely,

James Breshears

James Breshears, N6XCR

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FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

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MAY 29 1998

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

To: The Secretary,
Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

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

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

Amateur Radio has and will continue to share its VHF/UHF allocations with *mutually compatible* services and operations. These have included, the U.S. government, the U.S. military, NOAA doppler wind shear radar and other government radio location services. 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

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

Many government agencies and non-profit disaster relief organizations would be tremendously harmed by the loss of the Amateur 420-430 and 440-450 MHz allocations. The following is a partial list of agencies that I have assisted with providing emergency communications via Amateur Radio using the 420-450 MHz band: State Of California, Calif. Dept of Forestry, and U.S. Forest Service VIP program has full access to use this state wide repeater linked system in a event of a disaster such earthquakes, Floods, Fire, Civil Unrest, or any other natural causes.

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.

Southwest Remote Radio Club is a primary user of the UHF 420-450 Mhz Spectrum. If the club were to relocate to 1.2 Ghz the cost for new equipment, repeater, link radios, duplexers, cabling, antennas, yagi's, etc could cost on average of 12 to 15 thousand dollars per site. This Club has 29 sites throughout California, Western Arizona, Southern Utah, Southern & Central & Nevada with 420-430 linking paths between radio sites up to 150 miles apart we accomplish this on UHF. If moved to 1.2 Ghz on the long distance sites 1-2 additional sites would be needed. Then again cost of additional equipment between these sites as 1.2Ghz doesn't travel the distance like 420-450 Mhz. If this proposal where to go through to LMCC this would be a TOTAL devastation to the Amateur community, this Club, and many other Clubs.

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, Gerald N. Spronz

Gerald N. Spronz, K6IOJ
14724 Walnut st
Hesperia, Ca. 92345

May 26, 1998

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Before the

Federal Communications Comission

Washington, DC 20554

In the matter of	)	
	)	
RM-9267	)	
	)	
Reallocation of portions of the	)	
Amateur 420-450 MHz band	)	RM-9267
to Land Mobile use.	)	
	)	
May 25, 1998	)	

Dear Mr. Secretary,

Please find enclosed 5 copies of comments on RM-9267. Please see to it they are distributed to the proper people. Also please note that, due to lack of a copier, all 5 copies have been signed by hand.

Thank you very much.

Respectfully Submitted,

Tim Stoffel

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

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May 26, 1998

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

RM-9267

Dear Commissioner:

As part of the amateur radio community and an Amateur Radio Emergency Service (ARES) and Radio Amateur Civil Emergency Service (RACES) member, I am very dismayed to learn that the Land Mobile Communications Council has petitioned the FCC for reallocation of two thirds of the 70 Cm amateur radio band to the Private Mobile Radio Service.

For search and rescue operations, the 420 to 450 MHz band is becoming vital for cross band communications in our difficult terrain on the Olympic Peninsula. Due to the rapid population growth in our area, there are more and more people going into one of the most beautiful and rugged areas of our state. These people are for the most part well prepared and knowledgeable. But there are a small percentage who are not and these are the ones we must be prepared to help when they are injured or lost.

Natural disasters also are a part of our considerations and cannot be ignored. We are occasionally reminded of this by minor (so far) earthquakes and if a really large earthquake should strike our area, no one could expect even the hardiest of public service or commercial communications services to survive. Whereas the radio amateur community because we are so dispersed, some, if not most would survive to provide emergency communications and the 420 to 450 MHz amateur radio band would be an essential link in a devastated area.

Donald A. Hood

Donald A. Hood, KC7VQD
130 N.E. Pine Tree Pl.
Tahuya, WA 98588
(360) 275-3695

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May 24, 1998

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

Re: Comments on RM-9267

Gentlemen:

I would like the LMCC to consider other options than occupying the 420-450 MHz segment of the UHF band.

I operate an Amateur FM repeater on 442.975/447.975 MHz from a local fire station. If I were to loose privileges in this band, I would not be able to provide public safety emergency communications for our community. This repeater also promotes interest and skills in radio communications for many radio amateur volunteers.

To loose these frequencies would result in significantly more crowding and interference in this band or any other band we are currently permitted to use.

I urge you to deny the LMCC's request for spectrum in the 420-450 MHz band.

Thank you for your attention to this important matter.

Sincerely,

William D. Rourke

William D. Rourke
19605 - 40th Place, NE
Seattle, WA 98155-2823

Commercially licensed since 1957
Amateur licensed since 1953

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20-May-1998

Secretary
Federal Communications Commission
1919 M St. NW
Washington DC 20554

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Re: Request for rulemaking, RM-9267

Ladies and Gentlemen:

I would like to comment on request for rulemaking, RM-9267.

Please DO NOT SUPPORT the amateur reallocation request of the Land Mobil Communications Council (LMCC). Specific concerns:

1. I believe that this request for spectrum reallocation will adversely impact the amateur services' ability to aid in emergency and disaster communications. More specifically, if the amateur service is removed from or relagated to a lesser spectrum use priority, this will create a chilling effect amoung amateurs to invest private, personal/money in equipment to service this band during times of emergency (repeaters, hand-helds, and data communications equipment). And IT IS WELL KNOWN THAT CELL PHONE SYSTEMS FAIL DURING MAJOR EMERGENCY EVENTS, and as much redundancy and individual empowerment as possible is required during emergencies. Every dollar invested by individuals in redundant, personal, emergency equipment/communications is one less dollar the federal and state governments must invest for disaster relief efforts. I personally will be out about $1200.00 in personal communications gear, rendered obsolete by ruling in favor of RM-9267.

2. The commercial mobile and wireless services have access to many billions of dollars, some of which can be redirected to research in transmission/protocol/efficient spectrum usage. The amateur spectrum represents an "easy kill" for these commercial concerns, as they can easily adapt amateur technology and vendors to their for profit use. Please do not encourage them to "knock off" the amateur spectrum allocations for a "quick kill". Instead, encourage these same commercial concerns to search for, and apply new techniques to utilize existing spectrum, higher range frequences, and effiecient spectrum utilization techniques to accomplish their commercial objectives.

Thank you for your time and attention.

Regards,

Ronald Martin

Ronald Martin, kd5chw
7618 Shady Hollow Lane
San Antonio TX 78255 USA
210-522-5541 (voice, days)
E-mail: roland@swri.edu

cc: file
cc: ARRL

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Re: RM-9267

FEDERAL COMMUNICATIONS COMMISSION
Attn: Secretary
1919 M Street, NW
Washington, D.C. 20554

ALBERT D. WRIGHT
4586 Sycamore
Holt, Michigan 48842
May 20, 1998

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Before the

FEDERAL COMMUNICATIONS COMMISSIONS
Washington, D.C. 20554

In the Matter of the LMCC's proposal
To REALLOCATE THE 70-CM BAND TO PMRS RM-9267
Titled, "Opposition to the LMCC's Request to reallocate Primary Status
Of 70-cm to the Private Mobile Radio Service

To: The Chief; Private Wireless Division

Wireless Telecommunications Bureau

OBJECTION TO

REALLOCATION OF PRIMARY 70-CM STATUS TO PMRS

I am writing this letter to express my opinion to the Land Mobile Communications Council's (LMCC) request that primary user status of the 70-cm band be allocated from The federal government to the Private Mobile Radio Service (PMRS). I am a radio Amateur, and we currently use the 70-cm band for coordinating emergency responses in Ingham Co, Michigan. Examples of our public service usage include tornado and severe Weather spotting, back up emergency communications for local police, fire, and ambulance, and civil defense communications with our RACES group. I feel strongly that the public would be best served by denying RM-9267, and preserving the 70-cm band for military and amateur usage.

Thank You,

Albert D. Wright

ALBERT D. WRIGHT KE8DR

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RE: RM-9267

May 26, 1998
Hoquiam, Washington

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

Dear Sirs:

The reallocation of the frequency bands 420-430 and 440-450 MHZ for the use of the Private Mobile Radio Service will severely jeopardize the efforts of amateur radio to provide the emergency communications that are so important to our country.

The amateur radio community has invested many thousands of dollars in equipment that is critical in our ability to provide emergency, public service and public interest communications. This equipment is in operation, across the nation.

Amateur radio has been proved to be a critical tool in times of disasters, such as floods, tornados, volcanic eruptions, to save lives and property.

Please take this issue under advisement.

Gilbert D. Brule
1003 Wheeler Ave.
Hoquiam, Washington 98550

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Reply Comments:
Dan Sherwood
1220 West Ave. J-14
Lancaster, CA 93534

RE: RM-9267
LMCC Petition for Rulemaking
Spectrum Reallocation to PMRS

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To Whom It May Concern:

As a private citizen and Amateur Radio operator, I am opposed to the provisions of RM-9267 that would result in the reallocation of the 420-450 MHz UHF spectrum to PMRS. The present sharing arrangement between Government and Amateur operation in this segment has worked well. This is due to the fact that most Military operations using this segment are geographically isolated from the Amateur communities in the urban areas. Commercializing this spectrum would result in significant interference and an eventual phase-out of Amateur operations on these frequencies. I feel this is not in the best interest of the United States for the following reasons:

- Don't count out military needs of this spectrum. Although the Cold War is over, developments in Asia and the Middle East may lead to increased need for this spectrum in time of crisis.
- Good cooperation between Amateur and Military users when interference does occur. Since Amateur operation is frequency agile within this segment, users can easily change frequencies if asked to by an Installation Commander. This is not the case with fixed-frequency commercial operation.
- Public Service: A long history of public service communications in the Amateur service is jeopardized by the loss of this important band segment. This is the second most popular allocation in the Amateur service. With the 144-148 MHz band becoming more congested in urban areas, usage of the 440-450 MHz segment is increasingly required. The cross-band repeat functions built into dual-band amateur rigs can be extremely useful in getting communication in and out of remote areas during fires, floods, earthquakes, and special events. In an emergency, speed is of the essence, and half the Amateurs licensed today own this type of equipment. Amateurs provide millions of dollars worth of services for free to governmental agencies and private foundations, many of those members of LMCC.
- Weak signal, packet radio, satellite, and ATV, (fast-scan TV): Primary PMRS repeater operation in the 420-440 MHz region would not be compatible with these modes. Amateur operation here would have to cease to exist if it is secondary to PMRS. Spectrum available for educational and public service use would no longer be available for free.

In conclusion, I feel that just like we have national parks, some of the radio spectrum needs to be set aside for non-commercial use. The amateur bands fall into this category.

Respectfully Submitted,

Dan Sherwood, WA6PZK

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MAY 29 1998

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In the matter of OBJECTION to the petition for rule making, RM-9267; request for re-allocation in the 420-450 Mhz band.

To: The Chief, Public Safety and Private Wireless Division,
Wireless Telecommunications Bureau

From: Richard Gilles KA9SVS
156 S. Ridge St.
Crown Point, Indiana

Dear Sir,

It has recently been brought to my attention that there is a petition pending before the board which, if approved, would re-allocate portions of the UHF spectrum now in use by amateur radio operators.

The portion of the band in question, 420 to 430 Mhz and 440 to 450 Mhz, is arguably the second most popular band available to amateur operators. The varied uses, from moon bounce to repeater operation to slow scan television, and all areas between are too numerous to name.
These various forms of communication not only allow a medium for casual conversation, but they provide opportunities for honing our conversant skills and advancement of the amateur radio communication field through experimentation.

I need not remind you of our primary purpose for

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existence which is to provide a service to our community. We accomplish this not only in times of emergency and disaster, but also by providing communications between military personnel and their families, missionaries in foreign lands and during events such as charitable marathons and the Special Olympics.

At the same time, close examination of the Land Mobile Communications Council's petition to re-allocate the spectrum to the Private Mobile Radio Service will reveal a plan that does not address these issues. To suggest that the amateur community would benefit by this re-assignment is far fetched at best. No such benefit or advancement of the hobby has been experienced to date through the re-allocation in the 220 Mhz band.

To bow to the wishes of big business, which is who the LMCC speaks for, in the long run, is not in the best interest of our citizenry or communities.

I therefore strongly urge you to reject this ill conceived, self serving petition by the LMCC.

Sincerely, Rich Gilles KA9SVS

Rich Gilles

File Number: RM-9267

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

Dear Sirs:

I'm writing to comment on RM-9267.

I am an amateur radio operator. I use the 440 to 450 MHz band daily. This band provides vital communication links where I live. The amateur radio community in my area serves the public by providing emergency communications and weather spotting activities. The loss of this band will seriously affect our ability to provided these services.

Please deny the petition and continue to protect the 440 to 450 MHz band.

Thank you,

Ronald E Branam

Ronald E. Branam, PE
KT4IW
484 S. Pine St.
Dayton, TN 37321

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