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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 420-430 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

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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:

- American Red Cross
- Greenup County, KY EOC
- Greenup County, KY Sheriff's Dept.
- County Judge Executive's EOC, Greenup County, KY
- Boyd County, KY EOC
- State of Kentucky Emergency Operations Center

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,



Ted Huddle, W4CID  
9024 Regency Woods Drive  
Kirtland, OH 44094

May 22, 1998

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May 24, 1998

FEDERAL COMMUNICATIONS COMMISSION  
Secretary of the FCC  
Room 222  
1919 M Street, N.W.  
Washington, DC 20554

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Reference: RM-9267

Dear Commissioner and Members of the Commission:

I wish to draw your attention to a matter of great concern to me. As a licensed Amateur Radio operator, I wish to go on record as being strongly opposed to the petition referenced above. I am active on the Amateur Radio bands on a daily basis. The Amateur Radio frequencies are constantly used to promote the public welfare and safety through a variety of emergency, disaster, public service, and community service communications activities.

The frequencies at issue in RM-9267 (the 420-430 MHz and the 440-450 MHz portions of the band) proposed for reallocation by this petition are critical to our continued success in serving the public through Amateur Radio. The frequency band segments impacted by this petition include important linking control, repeater, and amateur television systems that are utilized every day by a substantial number of licensed Amateur Radio operators.

I have been a licensed Amateur for six years, and have been active since the first day of licensing, specifically on the segments of the Amateur frequencies that are targeted in RM-9267. The remote control of transmitters and receivers operating on these frequencies and over a wide geographic area has many times been utilized during extreme disasters. I have witnessed and on occasion participated in emergency and health and welfare communications, when other types of communications services were inoperable, or at best, inadequate due to the heavy volume of communications.

A personal experience, as a result of a major earthquake in Los Angeles, dealt with the ability (via Amateur Radio from my home in the Dallas, TX area) to communicate with Amateurs in Los Angeles who paid a visit to my mother-in-law who lives alone and was bed-ridden while recuperating from a major accident. Telephone service was out of the question, and learning that aside from being shaken up and scared, she was otherwise not injured or in danger. It is clear to me that the assistance and dedication of the Amateur Radio community makes stories such as this a routine occurrence during natural disasters and other emergencies.

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CIRABODE OET

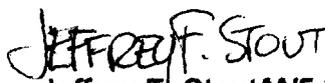
I respectfully remind the Members of the Commission that virtually *all* of the time, talent, dedication, equipment, resources, and operating expenses for all of this vital communications resource is borne by the individual Amateur Radio operators, *at no cost to any segment of government, public service organization, or private citizen*. The standards of technical excellence and professionalism demonstrated by the Amateurs in these efforts are a matter of great personal pride, which is reflected in the quality and reliability of the communications systems they install and operate.

Amateur Radio has proven to be a very compatible and successful secondary user to the Federal Government's radiolocation (Radar) operations on these frequencies. The petition (RM-9267) *contains no technical solutions or recommendations* to indicate how the Amateur Radio community could continue to operate on these frequencies without serious interference if land mobile communications were to become the primary user.

The Commission's **approval** of RM-9267 (or any PMRS activity on any Amateur Radio frequency band) will, in effect, terminate all Amateur Radio operations for any purpose on that band. Radio operations by licensed Amateurs throughout the country will be adversely impacted (if not totally eliminated) by the loss of almost half of the available amateur VHF/UHF spectrum between 30 and 900 MHz. The impact of such action, and the detriment to emergency and public service communications and the loss of this vital national resource would create a situation that could not be quickly, easily, or inexpensively overcome.

In the interest of a timely submission of this letter, it was necessary for me to take time during my vacation in the Southern California area to write, so that I may strongly urge the Commission to DENY approval of RM-9267.

Sincerely,

  
Jeffrey F. Stout/W5JFS  
4240 Fryer Street  
The Colony, TX 75056

MAY 29 1998

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21 May 1998

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

**Reference: RM-9267**

Dear Commissioner and Members of the Commission:

I wish to draw your attention to a matter of great concern to me. As a licensed Amateur Radio operator, I wish to go on record as being strongly opposed to the petition referenced above. I am active on the Amateur Radio bands on a daily basis. The Amateur Radio frequencies time and time again are utilized to promote the public welfare and safety through a myriad of emergency, disaster, public service, and other community service communications activities.

The frequencies at issue in RM-9267, the 420-430 MHz and the 440-450 MHz portions of the band proposed for reallocation by this petition are vital to our continued success in serving the public through our efforts. The frequency band segments impacted by this petition include important linking control, repeater, and amateur television systems that are utilized around the clock and every day by a very large number of licensed Amateur Radio operators.

I have been a licensed Amateur for six years, and have been active since the first day of licensing, specifically on the segments of the Amateur frequencies that are the subject of this petition. The remote control of transmitters and receivers operating on these frequencies and over a wide geographic area have many times been utilized during extreme disasters. As a resident of Southern California, I have witnessed and when necessary, participated in emergency, and health and welfare communications, when other communications services were rendered inoperable. One need only review the circumstances relating to the major earthquake in Los Angeles, the devastating brush fires through the densely populated suburban areas of Los Angeles County, and more recently, the damaging and wide-ranging aftermath of the "El Nino" storms.

I wish to respectfully remind the Commissioner and Members of the Commission that 100% of the time, talent, dedication, equipment, resources, vehicles, and operating expenses for the operation, installation and maintenance of this vital communications resource is borne by the individual Amateur Radio operators, *at no cost whatsoever to any echelon of government, public service organization, or private citizen.* The high standards of technical excellence and professionalism demonstrated by the Amateurs in these efforts are a matter of great personal pride, which is reflected in the quality and reliability of the communications systems they install and operate.

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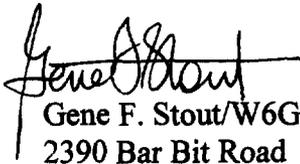
MAY 29 1998

Amateur Radio has ~~been~~ proven to be a compatible and successful secondary user to the Federal Government's radio ~~location~~ (Radar) operations on these frequencies. The petition (RM-9267) *contains no technical solutions or recommendations* to indicate how the Amateur Radio community could continue to operate on these frequencies without serious interference if land mobile communications were to become the primary user.

The Commission's approval of RM-9267 or any PMRS activity on any Amateur Radio frequency band will, in effect, terminate all Amateur Radio operations for any purpose on that band. Radio operations by licensed Amateurs in Southern California, as well as the rest of the country, will be very severely hampered (if not totally eliminated) by the loss of nearly half of the available amateur VHF/UHF spectrum between 30 and 900 MHz. The impact of such action, and the detriment to emergency and public service communications and the loss of this vital national resource would create a situation that could not be quickly, easily, or inexpensively overcome.

I very strongly urge the Commission to DENY approval of RM-9267.

Sincerely,



Gene F. Stout/W6GFS  
2390 Bar Bit Road  
Spring Valley, CA 91978

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May 25, 1998

Secretary  
Federal Communications Commission  
1919 M Street, NW  
Washington, D.C. 20554

Subject: RM-9267

Dear Sir:

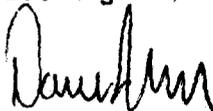
I am a new participant in the amateur radio operations in the 420-430 and 440-450 Mhz frequency bands. I support repeater groups on 445.525, 445.650, 445.425, 448.800, and 449.475 Mhz as well as simplex frequencies in these ranges. I work with many amateurs in this area and hope to use it throughout the United States.

I echo the concerns of many other participants who conduct amateur radio operations in this entire frequency range for emergency preparedness work and actual emergency communications augmentation during fire, flood, earthquake, and landslide emergencies which are prevalent in our Southern California environment. These communication supports are not duplicated by commercial or mobile facilities, but augment them. I am certain that the loss of these frequencies to amateurs would prove detrimental to the public service and emergency services which we support.

As an amateur licensee since 1998, I urge that the proposed frequency reallocations of RM-9267 be denied and that the referenced frequencies be kept in the amateur service.

Truly yours,

David Threadgold KF6PSO  
2728 S. Westgate Ave.  
Los Angeles, CA 90064



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May 22, 1998

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

Subject: RM-9267 Opposition

As an Emergency Operator for Chester County ARES RACES as registered with Chester County Department of Emergency Services, southeastern Pennsylvania and a licensed amateur radio operator, I'm in total opposition to the request of the LMCC for access to the 70 cm band and any of the other amateur bands. These bands represent a strategic capacity of communications outside any commercial assigned bands in time of severe disasters or war emergencies. The distribution of amateur frequencies through MF, HF, VHF, UHF represent a unique capability to establish emergency communications at any time of day or night, over any distance, direct or indirect, without reliance on any commercial utility or service.

Further more, the existence of thousands of volunteer amateur radio nets, in all parts of the United States, provide local, intrastate and interstate networks that can function outside any commercial reliance is unique and must be preserved. Few countries anywhere in the world have this communications alternative. A few significant local factors for this opposition are stated below, many of which parallel those of hundreds of counties and cities throughout the United States.

Opposition purpose:

2 Nuclear Power Station EPZ (10 mile radius) and Three Mile Island NPS (55 miles west)  
Greater Philadelphia Suburban Region  
Population in excess of 2 1/2 million  
Commercial aircraft flight paths of: Philadelphia, Lancaster, Reading, Chester County.  
Decades of ARES RACES service, planning, technical system development in place  
70 active volunteer Chester County Response Teams, 7 Zones (55 Zip Codes), 6 Hospitals  
2mV 220 / 70 cm repeaters and links, CCAR system currently active 24 hours a day  
10 privately owned AC generators that can be put into service for CCAR amateur radio emergencies

Amateur Radio, the enormous National Resource

There is no substitute for a well planned, strategic, back-up, STAND ALONE, communication system supported by amateur radio volunteers that respond to any major call in support of Chester County Department of Emergency Service, sponsoring civil defense organization, and related agencies. The Amateur Radio Bands (including 70 cm) must remain in tact with the promise to be continually available.

The expansive and flexible capability of up to half million licensed amateur radio operators coast to coast are proven and ready if needed. This is an enormous National Resource of free (no expense) dedicated, technically equipped, volunteer communicators, outside commercial communications limitations.

LMCC and all other agencies, corporations and their technical staffs must seek spectrum availability outside the Amateur Bands.

Yours truly

Robert K Dibeler, WB3GUB  
Chester County ARES RACES, Pennsylvania

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715 Edelweiss Drive  
Lake Zurich, IL 60047-2492  
May 26, 1998

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

File: RM-9267

Dear Sirs/Madams,

I am writing this letter in response to the request for rulemaking to allocate the 420-430 MHz and 440-450 MHz bands away from Amateur radio to private land mobile radio use.

I am very much opposed to the requested action. I am both a professional engineer in the land mobile radio industry as well as an Advanced Class Amateur radio operator. I use the UHF amateur band on a daily basis. There would be a great impact to my operations if the proposed rulemaking is adopted.

The UHF amateur band is full in the Chicago area where I live. By "full" I mean that no more repeaters are being coordinated by the area frequency coordinator. The idea that private land mobile radio systems can share this band with existing amateur radio operations is not realistic.

This band is critical to local emergency preparedness and community service activities. On a daily basis, I use two UHF repeaters that are operated by the Motorola Amateur Radio club. As with most amateur repeaters, this repeaters benefit the community as well as the amateurs that use them. These repeaters are available for use in times of natural disaster to provide supplemental communications to local emergency services personnel. I also volunteer my time to operate my equipment on the UHF amateur band for community events such as 10 K races and the Halloween "Pumpkin Patrol." Without the UHF Amateur repeaters that support community events and our emergency preparedness exercises and events, the community at large and emergency services officials will be left without an important resource. It is important to stress that these services and volunteers time are provided without charge to the community.

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In addition to Amateur Television and experimental operations, the 420-430 MHz segment is also very heavily used for linking wide area repeater systems in the Chicago area. These systems would not be able to provide the level of service that they do if repeater links in the 420-430 MHz region were not available. The land mobile radio standard practice of using leased telephone lines is not practical due to the high cost of these circuits and the fact that Amateur systems are supported voluntarily by members of various ham radio clubs.

In addition to my UHF repeater operations on this band, I also operate a personal vehicular repeater on 445.025 MHz. This is used to extend my coverage into distant radio systems by operating through my higher powered mobile radio.

If the Amateur allocation was changed from 430-440 MHz I would be left with half a dozen radios that would be absolutely useless to me. Many Amateur radios (Icom, Kenwood, etc.) will not tune the 430-440 MHz segment. The commercial radios that I use in the amateur band also will not operate below 433 MHz as this is the dividing point between the "range 1" (406-433 MHz) and the "range 2" (433-470 MHz) models.

There is no comparable spectrum for these UHF Amateur operations to be shifted to. The 900 MHz band is the only band that is close in frequency and has comparable bandwidth. However, this band is not usable due to the proliferation of part 15 devices, vehicle monitoring systems and the close proximity of very high power 928-931 MHz paging transmitters. There has historically been a lack of Japanese Amateur manufacturer interest in this band so that suitable equipment is very hard to find.

I would suggest that the LMCC await the new VHF spectrum that will be freed as a result of the DTV rulemaking and the transition of broadcast television transmitters to the high VHF and UHF channels. The use of the 420-430 MHz and 440-450 MHz Amateur allocations for private land mobile radio is a bad idea.

Sincerely,

A handwritten signature in cursive script that reads "John Gilbert".

John Gilbert

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23 May, 1998

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FEDERAL COMMUNICATIONS COMMISSION  
Washington D.C. 20554

In the Matter of	)		O
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Proposed Reallocation of	)	Rm 9267	G
420 to 430 MHz from the Federal	)		I
Government to the Private	)		N
Mobile Radio Service.	)		A
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Dear Sir:

I am Keith C. Jones W6OB. I have been a amateur radio operator for 62 years. I have also been a V.E. examiner for 11 years. My V.E. Team has processed over 700 applicants, both new and upgrades.

When I first got my license, there were about 38,000 licensed hams in the U.S.A. Today, there are more than 800,000 licensed hams in the U.S.A. Many of the new hams are of the "no code" level of license. This means these new hams are limited to the frequencies of 144,000, 220,000 and 440,000. These "no code" hams worked very hard to pass the exams to receive the opportunity of operating the ham bands that their license allows, and there are thousands of them.

The new hams as well as the old hams use the 440.000 MHz band for "chit chat" as well as "public service" and "emergencies". In California, we are prone to have earthquakes and fires in the mountains that are close to us. I have been through seven major earthquakes since I have been a ham operator and I do understand emergency situtaions.

In our town of Hemet, we have a large group in the RACES program that has provided communication for the fire fighting group many times. We also provide communication for public service for the local events. Packet is one of our major modes and packet is linked to 440,00MHz as a back bone to all of the other nodes..

In closing, I would say, it would be a big loss to thousands of the new "no code" hams to lose part of their sub-bands. It would also effect much of the other of other modes of operation of many of the other hams, not just the "no code" level of licenses.

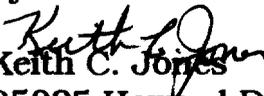
All of the current ham bands have been assigned to the hams for many years, I sure hope the F.C.C. sees this the same way that I

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and all of the licensed hams see it and keeps the all of the current bands as ham bands.

With the influx of the many new hams, we really need more bands not less bands or less sub-bands.

Sincerely,

  
Keith C. Jones W6OB  
25085 Howard Dr.  
Hemet, Ca. 92544-1939

DOCKET FILE COPY ORIGINAL

Reference: RM-9267

May 25, 1998

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

Members of the Commission:

I wish to register my vigorous opposition to RM-9267, the petition for rulemaking submitted by the Land Mobile Communications Council. Reallocation of the majority of the 420-450 MHz band would most certainly mean the end of amateur radio in this part of the spectrum, and that fact is the basis of my concern.

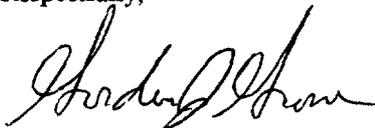
As the RACES Officer for Spokane County, I am well aware of the value of the 420-450 MHz band. It is not my job to calculate this value in dollars and cents; however, it *is* my job to maintain the public service viability of this area's radio amateurs. As proud and dedicated volunteers, forbidden by law from mining spectrum for financial gain, they give this band a unique value that money cannot buy. They provide not merely a service, but a *total* resource based on both a reserve of spectrum and human initiative. This mixture works very well, though its existence remains hard to explain to the public at large and lawmakers alike, whose attentions are more often drawn by the flash of those who have something to sell rather than something to give. Nevertheless, with wisdom, the Commission once invested in the value of this total resource on 420-450 MHz, making the amateur service the effective caretaker of the band. The Commission should revisit the origins and the wisdom of that investment, for RM-9267 would tragically destroy it all.

I could site all of the uses that Spokane County RACES and other amateur activity finds for this band, from FM voice repeaters, to data and control links, to television, space communications and experimental modes, and so on, but it's the same all over the nation as it is here in eastern Washington. The American Radio Relay League will, therefore, speak quite eloquently for me on this matter. As an amateur radio public service communications leader in my community, it is my purpose, then, to confirm that what the ARRL tells you is true and that the public stands to lose an irreplaceable resource if this spectrum is reallocated in line with RM-9267.

Especially over the short term, radio frequency spectrum is not a renewable resource. In a sense, amateur radio is. Through the perpetuation of interest in the radio art, amateurs have "regenerated" themselves to provide nearly a century of vital public service to their communities. The reserve of spectrum for amateur radio has made this possible; yet as invaluable as spectrum is to amateur radio, so remains the invaluable nature of amateur radio to the spectrum. Through the Commission, it is really the people's investment in a total resource, by and for themselves.

I urge the Commission to reject RM-9267.

Respectfully,



Gordon J. Grove

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GWYNETH J. MAGADITSCH  
9244 BIG MEADOW ROAD  
RIVERSIDE, CA 92509-4972

FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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

Gentlemen:

The Land Mobile Communications Council's (LMCC) request for immediate reallocation of these frequency segments from the federal government based upon "additional spectrum needs of the PMRS (Private Mobile Radio Service community" is directed solely toward commercial growth and should be rejected because:

1) The LMCC requests these frequencies to satisfy their most urgent need of voice and low-speed data communications. If added spectrum is needed and assigned, it should be on the basis of using new technology which will not disrupt the current use of the same spectrum. For example, if LMCC were to use spread-spectrum technology, they could share spectrum on a tertiary basis without impacting the present users.

2) The Amateur Radio Service has experienced considerable growth, with increased utilization of these frequencies for both regular and emergency communications. Many of the handheld and mobile transceivers owned by Amateur Radio Operators include this frequency band along with 144 to 148 MHz. These operators have already made significant personal investments in equipment so as to be prepared for disaster communication emergencies.

3) The Radio Amateur Civil Emergency Services (RACES), the Amateur Radio Emergency Service (ARES) and local emergency services all include these frequencies as an integral part of their emergency communication plan.

4) LMCC, in its desire for possession of these frequencies on a primary basis, suggest that Amateur Radio applications can remain as secondary to PMRS, but has failed to detail how that can be accomplished, without disrupting or seriously impacting, the Amateur Radio Service, especially as it relates to simplex, repeater, data, and disaster communications.

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5) The Amateur Radio Service has long been recognized for its role in providing unparalleled service in disasters. Everyone realizes a disaster results in an immediate overload of telephone and commercial communication circuits. This overload is analogous to an automobile traffic jam which occurs when everyone leaves a major sporting event--road designers simply do not plan for all peak traffic loads, just reasonable traffic loads--and the same applies to communication system designers. Amateur Radio Operators provide the nation with a zero cost emergency communications system using: a) equipment that does not cost the taxpayer anything; b) trained and experienced volunteer operators, and c) invaluable communications coverage during the initial critical hours of a disaster. Police Departments, Fire Fighters and Service Organizations (such as the Red Cross) are all dependent upon Amateur Radio Operators during disasters, both large and small.

I urge the Commission to reject this request by LMCC.

Sincerely,

A handwritten signature in cursive script that reads "Gwyneth J. Magaditsch".

Gwyneth J. Magaditsch

909-685-7441

MAY 19 1998

20 Elizabeth Road  
Milford, MA 01757  
(508)634-9928  
May 24, 1998

FCC

Regarding the LMCC's petition for Rulemaking, RM-9267

To Whom It May Concern,

I have been informed that the Land Mobile Communications Council (LMCC) has asked the FCC to immediately reallocate 420 to 430 MHz and 440 to 450 MHz from the federal government to the Private Mobile Radio Service (PMRS) on a primary basis. Amateur Radio now uses 420 to 450 MHz on a secondary basis, and the 430 to 440 MHz segment is an international allocation.

I wish to state that I am opposed to this reallocation. The LMCC's request is based upon greed rather than public service. The federal and amateur use of these frequencies serves the public in many ways that I am sure you are already aware of. The radio spectrum is a public resource that is limited. Considerable public and private money has been spent to set up and maintain communications capabilities that are continually reproven throughout each year wherever disaster strikes throughout the nation. Granting the LMCC's request means moving everything to another band. This would cause the people of the United States unnecessary suffering due to loss of responsiveness of relief efforts.

I know that PMRS already uses 420 to 430 MHz in three Canadian border cities (Buffalo, Cleveland and Detroit). This means that there is a small investment in development and equipment compared to that of federal and amateur users. It may be wise to keep this type of

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communications restricted to a small band of spectrum in order to help force the development of more spectrum conserving communications techniques. Since their current investment to date is minimal it should be easier to relocate a band area less heavily relied upon by the public.

The development of the telephone was a good thing; it serves the public well in times of need. Cellular technology has done much to improve the usefulness of the telephone network in times of private need. However, neither of these technologies prove to be useful in areas of widespread disaster. even when the cellular networks remain in tact, the public outcry floods the communications channels making it very difficult to use them to help with relief efforts. Will the PMRS be any different? I doubt it. It will be more spectrum for the public to flood with personal communications that will prevent its use by those attempting to provide aid.

I hope that you will consider my comments seriously and deny the LMCC's petition for rulemaking identified as RM-9267. I feel that allowing this reallocation is too high a price for the American public to pay for too little benefit.

Sincerely,



Francis L. Belliveau

P.S. Direct impact upon me personally would be a loss of 8 years of money currently budgetted to improve my readiness to help in time of disaster. This money would need to be used to replace equipment I currently have in service. Additionally there would be a large number of linked repeaters that I currently use that would also require replacement by private groups. This total would be on the order of \$1,000,000 us

DOCKET FILE COPY ORIGINAL

May 23, 1998

To: Secretary, FCC  
1919 "M" St. NW  
Washington, D.C. 20554

From: Brian Treusch, W6LL, Emergency Coordinator (Training) Oakland  
ARES/RACES.  
488 44th Street  
Oakland, CA 94609-2136  
(510) 658-0625

Re: RM 9267 (Land Mobile Communications Council)

To Whom It May Concern:

It was with complete shock and disbelief that I heard about the proposed RM 9267. Of course I realized that the lower 2 Mhz. of the Amateur 220 Mhz. band had been removed from "our" use several years ago, and with this former action in mind, I am writing the FCC to express my objection.

Because of the drastic cut backs in FCC enforcement of FCC rules and regulations in the Amateur Service, a great deal of time and energy has been spent, and continues to be spent, by amateur radio operators to try to devise methods to "self-police" our radio spectrum from the abuses of "ham radio vandals" and occasionally, outright radio fellows. Here in the City of Oakland, with its huge network of transportation systems and electronic/radio systems and interfaces, this attempt at "self-policing" is extremely difficult. A great deal of this "self-policing" was done on the 220 Mhz. band, but after the loss of the lower 2 Mhz. of this band, we were forced to use the 70 cm. band. If this spectrum is removed from the Amateur Service, any pretense of "self-policing" will become almost impossible.

For Disaster preparedness, the mainstay of amateur radio operations will continue to be 2 meters. In a huge metropolitan area like San Francisco/San Jose/Oakland, the demands on this band are certain to be overwhelmed. In anticipation of this frequency demand, our City of Oakland ARES/RACES group has decided to use 70 cm as the primary control and coordination band. In addition, we have constructed and operated a portable amateur television repeater for this band that would allow reception of amateur generated video communications by each and every fire station and shelter site in Oakland.

The loss of the better part of the 70 cm. band would deal a crippling blow to current emergency preparedness in the city of Oakland. This spectrum loss would ultimately lead to a steady deterioration of all amateur based emergency communications systems - after all, who would be interested in spending the enormous amounts of time and money needed to develop such systems when the FCC could announce that in about three weeks time, a proposal to remove amateur radio spectrum could be developed. This proposal to grant secondary status to amateur operation would have its most deadly impact in the dense urban areas such as ours, where amateur operation would certainly be forced off the air. It is in these dense, urban areas that emergency preparedness is the most developed and needed.

Respectfully,  
BET

*BET*

Sincerely,

*Brian Treusch*  
Brian Treusch (celebrating 40 years

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

19 May 98

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MAY 29 1998

FCC MAIL ROOM

Subject: RM-9267 Reallocation of the 420-450 MHZ band (70 cm) comm

Reference: Land Mobile Communications Council (LMCC) petition for rule making of reallocation of the 70 cm band.

The 440 (70 cm) band is one of the two emergency system pillars serving the Fayetteville, North Carolina area. In the past few years this band has played a vital part in providing communications prior, during and after natural disasters that have struck our community. The loss of this band would further restrict the capability of the amateur community to provide emergency communication services/system to the community.

The 190 members of the Cape Fear Amateur Radio Society (CFARS) recommend that FCC non-concur with the RM-9267 petition for rule making. On the bases that this action would have an adverse effect on the amateurs ability to provide emergency communication to the community and cost effectiveness of reallocation. Additionally, the LMCC should immediately conduct an extensive RF spectrum impact study to find a more suitable segment of the RF spectrum for future use.

Signed Sincerely

*Alan W. Thegan* NØPSH  
Cape Fear Amateur Radio Society Member

*OST*  
*OST*

CLARENCE MINOR  
P.O. BOX 501  
DEXTER, N.Y.  
13634

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MAY 29 1998

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5/27/98

Federal Communications Commission  
Room 222  
1919 M Street NW  
Washington, DC 20554

Dear Federal Communications Commission:

This letter is to support the amateur radio service and the ARRL in **opposing the LMCC on rule RM-9267**. If the Government takes away the radio spectrum designated to the amateur radio service the loss of emergency, public service and public interest communications will be significant.

The radio spectrum already used to the point that overlapping stations are readily overheard by others and the links on this band are used for communications in other radio bands. The loss of this spectrum will cause the emergency, public service and public interest in amateur radio to be severely crippled.

Sincerely,

*Clarence Minor*

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OET

RUSSELL PANDOLFO  
39243 RED LAKE RD.  
THERESA, NY 13691

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Sincerely,



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GREAT BENDON, Y  
13643

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FOG MAIL ROOM

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Sincerely,

*Allen F. Moore*

*BM*

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Robert W. Herman  
8414 Willow St.  
Evans Mills  
New York  
13637

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Sincerely,

Robert W. Herman

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Michele Sullivan  
1108 Bronson st  
Watertown, NY  
13601

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Sincerely,

Michele Sullivan KC2BYR

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Donald T. See  
19847 Evans Rd.  
Dexter, N.Y. 13634

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Sincerely, *Donald T. See*

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