

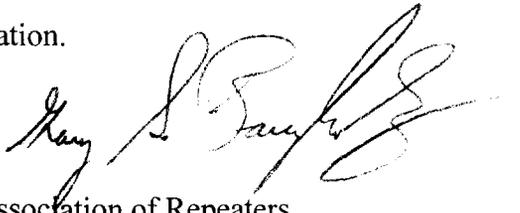
We also use the 70 centimeter band as a backbone to relay voice and data from other bands locally, across the state, and out of state. The loss of our ability to link and relay on the 440 band would cripple and severely limit the wide area coverage capabilities of our systems on the 2 meter Amateur Band, by far our most popular and heavily used of our VHF/UHF bands.

In my opinion, some of Amateur Radio's greatest benefits are that Amateurs operators are diverse, numerous, inventive, and experienced. When the commercial systems fail, hams are on the air in minutes or hours, not days or weeks. Amateur Radio (and our repeaters) offer a unique type of "one to many" communications which many other systems cannot accomplish. We are able to move into place with radios and repeaters and provide nearly instantaneous communications. Here in Wisconsin, Amateur Radio operators routinely work doing severe weather spotting for the National Weather Service, disaster and event communications for the American Red Cross, and with many other public service organizations and emergency government agencies.

Amateur Radio in Wisconsin is the sole provider of communications for many public events. Due to costs, failures, and the limited or non existent coverage range of other commercial systems and cellular phones in some areas of the state, many event sponsors could not hold their events at all without the help of HAMS, and their repeaters. Amateur Radio operators pride themselves on volunteerism and the use of our frequency spectrum for the public service. Annually, The Great Circus Parade (a nationally televised event in Milwaukee), many runs, walks and bike events in support of various charities and causes, all benefit from Amateur Radio communications, and our repeaters and links on the 70 centimeter band.

Amateur Radio is, and has always been in a difficult position with respect to our representation in Washington and with the F.C.C. We are volunteers who build high quality communications systems, our limited dollars go to building and maintaining the systems we use every day. We do not have the resources to mount large lobbying or public relation campaigns within the communications industry or our representatives in government. I understand and encourage business and technology advancements, especially within the communications industry. However, Amateur Radio can not compete with the millions of dollars in lobbying efforts and spectrum auctions which are the current way of the industry. I believe that the Amateur Radio Service and the frequencies as allocated to our use are a free and public resource that should be reserved and defended the same way our other national resources are. While the Land Mobile Communications Council petition indicates that it is willing to permit Amateur Radio to retain some sort of secondary status, I believe this would not be compatible with the continued amateur use of the band. I request that the F.C.C. consider the Amateur Radio Service in your evaluation of the LMCC's petition for rule making, and reject the LMCC request for use of the currently allocated Amateur frequencies.

Thank you for your consideration.

  
Gary Bargholz N9UUR  
Chairman, The Wisconsin Association of Repeater

RECEIVED  
JUN 1 1987

DOCKET FILE COPY ORIGINAL

Federal Communications Commission  
Secretary of the FCC  
Washington, D.C. 20554

Ref: RM-9267

Dear Commission:

As a licensed Amateur Radio operator I want to go on record as being strongly against the petition under consideration, RM-9267.

I am active on many Amateur Radio frequencies that promote the public welfare through emergency, disaster and public service communications. The frequencies stated in RM-9267, (420 MHz to 430 MHz and 440 MHz to 450 MHz) are very important to our continued success in serving the public through our work. These frequency band segments include important linking, control, amateur television and repeater systems that are used daily in Southern California.

Amateur Radio has proven to be a successful secondary user to the military radar operations on these frequency bands. RM-9267 contains no technical solutions to prove that Amateur Radio users could continue to use these bands without serious interference if land mobile communications become the primary user.

Amateur Radio operators in Southern California can continue to be a vital communications resource to the public during emergencies and disasters if RM-9267 is not approved.

Sincerely,

*Robert P. Pagette*

KFLF00

No. of Copies rec'd 074  
List A B C D E 0 2 T

1/1008

**RHEA COUNTY AMATEUR RADIO SOCIETY**

**PO BOX 233**

**EVENSVILLE, TN 37332**

**PRESIDENT; LARRY H. LYDA, WA4PJP**

**To: Office of the Secretary  
Federal Communications Commission  
Room 222, 1919 M Street NW,  
Washington, DC 20554.  
SUBJECT: RM-9267**

**May 25, 1998**

To Whom It May Concern,

I was made aware of the possibility of the 420-440 MHz band being given away to Private Mobile Radio Service. I am the president of the Rhea County Amateur Radio Society, located in Rhea County, Tennessee. Our organization is made up of a diverse group of amateur radio operators with all types of interests. Our Club has about 45 active members and is very much involved with emergency communications. Our group is involved in ARES and RACES and is involved with the Radiological Emergency Plan of the Watts Bar Nuclear Plant, near Spring City, TN. Several of our members are involved with the Civil Air Patrol in Dayton, TN. Several of our members are active in The American Red Cross Disaster program. Our members are active and constantly trying to improve on their skills of providing emergency communications.

It is disheartening to learn of RM-09267. Our members have invested several tens of thousands of dollars in their personal equipment used on the 440 MHz band. They have spent their own money and many hours of their time setting up and testing their equipment. Their intentions are to provide to Federal, State, and local officials dependable emergency communications at no cost.

In our area, 440 MHz is used by our group for repeater operations, Amateur television operations and simplex communications. If this band suddenly became unavailable to the Amateur community, our members would lose not only their own money but also valuable frequency allocation. Their communications are already established and the equipment is already in use. Losing this band would put a hardship on the whole Amateur Radio community not just in Rhea County.

As president of the RCARS, I ask you to consider the impact that this action would have on all of the Amateur community and the personal hardships that it would inflict upon American citizens trying to do their part for their Government.

Please do not give away the 440 MHz band.

Sincerely,

Larry H. Lyda, WA4PJP



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RECEIVED

Federal Communications Commission  
Secretary of the FCC, Room 222  
1915 M Street, N.W.  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

May 27, 1998

RE: RM 9267

Dear Commission:

As a licensed Amateur Radio Operator, I want 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 the public welfare through emergency, disaster and public service communications.

The frequencies bands 420 MHz to 430 MHz and 440 MHz to 450 MHz, proposed for reallocation by this petition, 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 by a large number of amateurs in Southern California.

As a five-year member of the Los Angeles County Disaster Communications Service, a registered RACES emergency organization, I have on many occasions, on a regular basis, used Amateur Radio repeaters and Amateur Television using these frequencies in support of California Department of Forestry, United States Forest Service, Los Angeles County Sheriff, Los Angeles County Fire, and San Dimas Mountain Rescue during routine drills and emergencies such as earthquakes, brush fires and searches for lost hikers. Such communications would be severely hindered by this petition.

I have been licensed for almost six years, and I personally use many different frequencies within these sub bands EVERY DAY. Experimental communications; complex linking systems; remote control of transmitters and receivers operating on these and many other amateur bands; Public service exercises; and real disasters. I operated on several systems of stations on these sub-bands during major earthquakes that have impacted this region of the country.

Amateur Radio has proven to be a successful secondary user to the government radiolocation 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.

Commission approval of any PMRS (or similar) allocation on this or any amateur frequency band will effectively terminate any Amateur Radio operations within the specified band. Amateur Radio operations in Southern California which are a vital communications resource to the public during emergencies and disasters will be very badly damaged by the loss of 49% of the available VHF amateur spectrum below 900 MHz.

I urge the Commission to DENY the above specified portions of RM-9267.

Sincerely,

*Lory J. Jefferson*

Lory J. Jefferson  
Amateur call KD6NJF  
10035 Orange Street  
Alta Loma, CA. 91737

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054

054

1830 Cook Avenue  
Wisconsin Rapids, WI 54494  
May 24, 1998

DOCKET FILE COPY ORIGINAL

JUL 1 1998  
Secretary, Federal Communications Commission  
1919 M Street NW Room 222  
Washington, DC 20554

RE: RM-9267

Dear FCC:

I am writing to voice my concern and opposition to RM-9267 in which the LMCC is requesting being made primary user of several groups of frequencies, particularly those frequencies now used on a secondary basis by Amateur Radio operators at 420 to 430 MHz and 440 to 450 MHz.

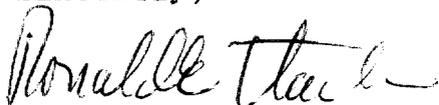
The 440 to 450 MHz segment is heavily populated by amateurs using both simplex and repeaters. I am the technical coordinator for the Midstate Repeater Association and we have been working on a plan to use UHF frequencies in the 440 to 450 MHz band as link frequencies to support remote receiver sites for our 146 MHz repeater. We need the remote receiver sites to fill in coverage out in some areas that are important to the Wood County, WI emergency government during storm watches where our spotters have trouble getting into the 146 MHz repeater which we operate. We are an all volunteer organization of amateur radio operators with very limited funding. We have already purchased some surplus UHF equipment to be used for this project. Loosing the access to these UHF frequencies will set the project back considerably, if not terminate it, due to lack of additional funds being available to re-engineer the links and procure the necessary equipment.

I personally am operating, from my home and mobile stations, one GE MASTR II radio on 446.0 MHz (the national simplex calling frequency), two dual band (146/440) radios and one dual band (146/440) hand held radio with associated antennas, etc.. I could not afford to relocate if I had to get off of the 70 cm band.

I would urge the commission to look favorably on the amateur radio community with regard to this rule making petition. Amateur radio operators provide much needed and appreciated public service communications for the community. We need the frequency allocations now in place to do the job.

Thank you for your consideration of my response.

Sincerely,



Ronald E. Tlachac W9UW  
Technical Coordinator, Midstate Repeater Association

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List ABCDE

5

OET

RECEIVED

DOCKET FILE COPY ORIGINAL

JUN 9 11 00 AM  
Thomas V. Mc Kernan Jr. *President*  
American Automobile Association  
Automobile Club of Southern California  
3333 Fairview Rd.  
Costa Mesa, California 92626

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

Dear Sirs:

I Have been a satisfied member of AAA- California for 10 years as member #57778805 60. Recently, however, I have learned that an organization of which AAA is a member has taken a position, allegedly with the support of AAA that is contrary to my interests.

On April 22, the Land Mobile Communications Council 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, for a variety of public service and public interest communications. The reallocation proposed by LMCC is incompatible with these operations.

As a licensed radio amateur for the past year, I and many others on the Orange County Sheriff Search And Rescue Team depend on these frequencies in our volunteer rescue operations. I am dismayed by the LMCC proposal. I am even more dismayed to find that AAA, an organization I have long supported, is listed as an apparent sponsor of this proposal.

I am requesting that you determine whether AAA has, in fact, adopted a position in support of RM-9267, and if so, what steps can be taken to request reconsideration of this position. If AAA has not adopted a position in support of RM-9267, I request a written statement to that effect.

Thank you for your attention to this important matter.

Sincerely,



Stephen P. Cherot  
145 W. Main Street, Suite 200  
Tustin, California 92780  
714-730-0933

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BOOKET FILE COPY ORIGINAL

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

DATE

RE: RM 9267

Dear Commission:

As a licensed Amateur Radio operator I want to go on record as being strongly against the petition under consideration, RM-9267. I am active on many Amateur Radio frequencies that promote the public welfare through emergency, disaster and public service communications.

The frequencies bands 420 MHz to 430 MHz and 440 MHz to 450 MHz, proposed for reallocation by this petition, 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 by a large number of amateurs in Southern California.

I have been licensed for 4 years, and I personally use many different frequencies within these sub bands EVERY DAY. Experimental communications; complex linking systems; remote control of transmitters and receivers operating on these and many other amateur bands; Public service exercises; and real disasters. I operated on several systems of stations on these sub-bands during the major earthquakes that have impacted this region of the country.

Amateur Radio has proven to be a successful secondary user to the government radio location 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.

Commission approval of any PMRS (or similar) allocation on this or any amateur frequency band will effectively terminate any Amateur Radio operations within the specified band. Amateur Radio operations in Southern California which are a vital communications resource to the public during emergencies and disasters will be very badly damaged by the loss of 49 Percent of the available VHF amateur spectrum below 900 MHz.

I urge the Commission to DENY the above specified portions of RM-9267.

Sincerely, *Larry Gump N3WLT*  
*1419 N Heathdale*  
*Covina, CA 91722*

*5*  
*OET*

RECEIVED

JUN 1 1978

THE CENTRAL OKLAHOMA VHF AMATEUR RADIO CLUB  
3028 N.W. 33rd St.  
OKLAHOMA CITY, OK 73112

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

Subject: File Number RM-9267

The loss to Amateur Radio of certain privileges in the 420 to 450 MHz band as currently proposed, would seriously deprive those amateurs involved in public service communications as well as advanced communication techniques by serious experimenters.

The Central Oklahoma VHF ARC was organized in the early 1950's to provide public service communications and promote experimentation on antennas, equipment design and propagation. For years this club maintained a station at the Oklahoma City Red Cross Hqs and provided HF and VHF communications on many local and regional disasters. In earlier years this club maintained a VHF station at the local Weather Bureau covering central Oklahoma during severe storms.

With the introduction of repeaters to enhance local mobile communications, 420-450 MHz has been widely used to link with other repeaters for greater coverage. In the aftermath of the Murrah Building bombing the normal communications systems were saturated. Local Amateur repeaters were very helpful in providing service to the Salvation Army and the American Red Cross.

The value of the contributions of Amateur Radio in advanced experimentation, and to communications during emergencies and disasters, natural and otherwise, should be given serious consideration when acting on petition RM- 9267.

Respectfully:

*Charles Greene*  
Charles Greene, WA5JGU  
Club president

*James Speck*  
James Speck, W5AI  
Club treasurer

*Robert Ashby*  
Robert Ashby, W5HXL  
Club vice-president

*J. R. Dome*  
J. R. Dome, KB5WVE  
Club secretary

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List A B C D E 130

1 1998

DOCKET FILE COPY ORIGINAL

May 26, 1998

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

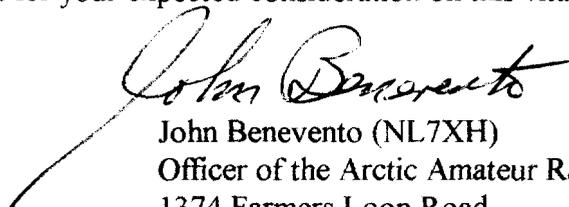
Reference **RM-9267**

Dear Secretary,

The proposed changes in the allocation of the 420 - 450 MHz band will have a very negative impact on the radio amateur network in Alaska. The network that is in operation in the interior of Alaska covers more than 65,000 square miles. The repeater network covers areas that have no other communications other than the amateur frequencies. We work very closely with state and local officials to provide communications in times of emergencies. The network is the life-line for many cabin owners and travelers on very remote roads that have no other communications available to them. This network is literally life and death communications for many of our network users. We have a very close relationship with the Alaska State Troopers, supplying them vital information from the hundreds of uninhabited highways.

The 440 (70cm) band is our primary link frequencies to make the network complete. Without the 70cm frequency spectrum we will not be able to survive. Please keep this band in the hands of the thousands of amateurs that use this frequency everyday.

Thank you for your expected consideration on this vital matter.



John Benevento (NL7XH)  
Officer of the Arctic Amateur Radio Club  
1374 Farmers Loop Road  
Fairbanks, Alaska 99709

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FEDERAL COMMUNICATIONS COMMISSION

RM9267

JUL 1 1998

DOCKET FILE COPY ORIGINAL

To: Federal Communications Commission  
From: Ed Deasy, licensed amateur radio operator, KF4UTD  
Subject: Land Mobile Communications Council request for reallocation of currently assigned amateur radio frequencies.

Dear Sirs:

This is a list of comments and concerns in response to the recent motion, brought by the LMCC, in regards to the reallocation of the spectrum 420-430 mhz and 440-450 mhz.

**Item 1  
Emergency Service Needs**

Amateur Communications in my area and on the frequencies mentioned above, are frequently in support of local public service or emergency operations. I should point out that, after 25 years active involvement in electronics I recently joined the amateur ranks solely to give something back to the community. Virtually every local emergency response agency uses the local amateur radio ARES (amateur radio emergency services).

The most common emergency-support situation, providing communications support from metal structured buildings such as hospitals, absolutely requires the use of the 440 mhz part of the amateur spectrum. Two meters (144-148 mhz) does not penetrate such structures well at all. On the other hand, 440 mhz signals are much more able to get out from such structures. So, the local ARES support staff usually will provide a vehicle with cross-band repeater nearby to the hospital or similar structure. This repeater will link the local 440 mhz transmission from the hospital to the vehicle, and from there to the local Two meter regional repeater. Without this capability amateur emergency services would be unable to support the majority of local community client organizations.

**Item 2  
Substantial lost investment in equipment.**

440 mhz is the second most popular band for amateur radio operators, in a time when more than %50 of licensed hams only have privileges for bands above 50 mhz. So, the most common purchase in recent years is the so-called "dual band" radio, which operates on Two meters and also on "440." These radios, the majority of them very new purchases, are not re-configurable to new frequencies, and would all end up in the trash. On the other hand, the LMCC is proposing a new service for which no radios are currently designed. I would suggest that some other part of the spectrum be allocated, one that will not cause hardship to private citizens.

**Item 3  
Problems for all VHF amateur operations in urban and densely populated areas**

The current "2 meter" band is in trouble in most areas of high population density. There aren't enough frequencies for repeaters and existing repeaters are strained beyond capacity. As pointed out earlier, the majority of hams are no-code licenses for whom the two meter and 440 mhz bands are the only bands in which repeater communications are possible. As a result, in many of these high population areas, the 440 mhz band is in heavy use and has become the only alternative for clear, unhampered communications. To take this band would cause extreme hardship.

**Item 4  
The end of repeater linking strategies**

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Across the United States, Two meter repeater strategy has begun to rely heavily on links which exist in the 440 mhz and 420 mhz bands. Repeaters are linked in Urban/Suburban areas with remote receivers, in more rural areas wide area repeater networks are linked using 440 mhz. These efforts would all be ended by the LMCC proposal. The wide area networks could not be linked using the next available higher frequencies, due to the distances involved.

#### **Item 5**

#### **No plan for "secondary use" presented by LMCC**

While the LMCC has mentioned the possibility of secondary, non-interfering use of existing amateur allocations, no plan for resolving these conflicts has been included in their proposal. Experiences with such arrangements do not bode well for the secondary user, who is simply bumped off the allocations in a systematic manner. And, could a seriously under-funded FCC find the staff to deal with these conflicts?

#### **Item 6**

#### **LMCC can tolerate a higher frequency assignment, but amateur radio operators cannot**

The LMCC has not specified the type of modern communications system it intends to use. However, only a trunked system is liable to provide the bandwidth necessary for a large user-base. Trunked systems, with myriad tower locations, are best suited for higher frequencies where communications are more "line of sight." On the other hand, amateurs cannot afford the capital investment of a trunked system and need frequencies where a few repeater facilities, strategically located, can service a wide area.

**End of comments**

DOCKET FILE COPY ORIGINAL

RE: RM-9267

1 1998  
Jeffrey S. Grudin AC6KW  
55 Suncrest Drive  
Soquel, CA 95073

May 27, 1998

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

RE: RM-9267

Dear Sir or Madam:

It has come to my attention that there is a petition before you (RM 9267) proposed by the Land Mobile Communications Council. This petition suggests reallocation of nearly two-thirds of the 420-450 MHz band to the private Mobile Radio Service.

The 70cm band is a very popular and important ham band. There are many repeaters carrying both public information and emergency traffic. These repeaters also provide voice links to other repeaters on other bands, in some cases allowing others to communicate to areas inaccessible without them. In addition, these repeaters act as digipeaters and packet nodes to provide for digital communications.

As you know, the amateur radio community provides voluntary emergency and non-emergency public communications for our communities. Much of these communications take place on these frequencies.

I believe that a loss of these frequencies would create much more crowding and interference on the portion of the band left, and on other VHF/UHF frequencies. This in itself would limit the usefulness of these frequencies in emergency situations.

I believe that the LMCC proposal is incompatible with the continued amateur use of these frequencies. Most amateur radio operators have radios that use these frequencies. The cost to replace all these radios and the existing repeaters would be prohibitive. I believe the loss of these frequencies would not only be costly to the hams that use them, but to the safety of the public that is given emergency communications by us.

Please do not allow this petition to become law.

Thanks you.

Sincerely,



Jeffrey S. Grudin AC6KW

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REST

**Edgewood  
Amateur Radio  
Society** RECEIVED  
JUN 21 1998

**W6NRY • 447.300-**  
**SERVING THE PUBLIC SINCE 1957**

May 19, 1998

**DOCKET FILE COPY ORIGINAL**

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

**Ref: Petition RM-9267**

Dear Commission:

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

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

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

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

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

Sincerely,

*Carol Hopping KB6WGY*

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1998

DOCKET FILE COPY ORIGINAL

May 28, 1998

**COMMENTS ON RM-9267**

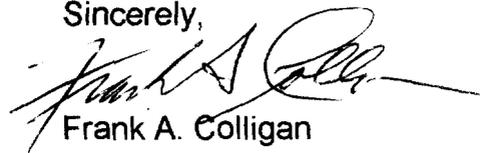
Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, NW  
Washington, DC 20554

Dear Secretary:

RM-9267, a petition for rule making by the Land Mobile Communications Council, would allocate certain frequencies to the private and public sectors. These frequencies are now allocated to Amateur Radio Service.

Amateur Radio Operators use these frequencies during times of emergencies to assist various relief agencies with vital communications. Amateur Radio Operators assisted during flooding in Northern California during the winters of 1997 and 1998. They performed an important role in public safety. These frequencies are an important part of this service, and I urge the FCC to leave this spectrum allocated to Amateur Radio. An important thing to remember is that an infrastructure of radio repeaters utilize these frequencies. That infrastructure is in place to be utilized during the next emergency. Reallocating the 420-430 and 440-450 MHz frequencies would severely hinder the effectiveness of Amateur Radio Service.

Sincerely,



Frank A. Colligan

3337 Forbestown Road  
Oroville CA 95966

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RECEIVED

JUN 1 1998

FCC MAIL ROOM

J. F. AND MARIE E. SCHMIDT  
1353 THORNDYKE ROAD  
PORT LUDLOW, WA 98365-9530  
360-437-0803  
FAX 360-437-2561  
[jschmidt@olympus.net](mailto:jschmidt@olympus.net)

May 25, 1998

Re: File # RM 9267 POB 2137

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

We are writing to express our opposition to granting the Land Mobile Services access to the 420-450 MHz band.

At present the band is heavily used by the Amateur Service. Its primary use is by repeaters, which during emergency conditions are used by the Amateur Radio Emergency Service (ARES) in assisting public service agencies and relief agencies in needed communications.

Amateur radio operators spend many thousands of dollars on equipment for the benefit of the community. Admittedly, they enjoy their use on a daily basis, but when there is an emergency they are among the first to volunteer their services and expertise.

As an example, the Port Ludlow Amateur Radio Club, to which we belong, just finished installation of a new repeater system on the Jefferson County (WA) Sheriff's Department radio tower. This installation, operating on 441.575 MHz, along with an amateur radio packet system installed in the Sheriff's Emergency Operations Center, are an integral part of the county's emergency response system. All of the equipment, at a cost of several thousand dollars, was paid for by the Club members.

If these frequencies are not available during emergencies, our county's ability to respond will be compromised.

The amateur radio organizations across the country have similar arrangements for community service, almost exclusively using the 144-148 MHz and 442-446 MHz bands. These groups also use frequencies in the HF bands for long distance emergency communications, but those frequencies do not allow the portability of hand-held units that the VHF and UHF bands offer.

Please allow us to continue these needed free emergency services to our communities. We only ask that you allow us to retain use of our present frequency assignments.

Sincerely,



John F. Schmidt, W7JS



Marie E. Schmidt, K7MES

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List A B C D E

4

OET

JUN 1 1998  
**RM-9267**

Jeff D Day  
714 S Cedar  
Sapulpa, Ok 74066

**DOCKET FILE COPY ORIGINAL**

Dear Sirs:

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

As a licensed radio amateur since 09/95, I am dismayed by the LMCC proposal.

Amateur Radio bands have served this country in many ways for many years. Thousands of radio amateurs, repeaters, packet systems, and amateur television transmitters occupy this spectrum. In times of disaster (man made or natural), war, and countless other health and welfare situations, these means of communications have helped save countless lives and property.

Please do not consider reallocation of the Amateur Radio spectrum...

Thank you for your continued support of the Amateur community!

Jeff Day  
KC5RBH

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FEDERAL ROOM

JUN 1 1998

FEDERAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

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

DOCKET FILE COPY ORIGINAL

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

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

Many government agencies and non-profit disaster relief organizations would be tremendously harmed by the loss of the Amateur 420-430 and 440-450 MHz allocations. The following is a partial list of agencies that I have assisted with providing emergency communications via Amateur Radio using the 420-450 MHz band:

- CAP
- Red Cross
- Baxter County SO
- Little Rock PD

Private and for-profit radio services do not have mutually compatible interests with the Amateur Radio Service. Sharing between private land mobile and the Amateur Radio Service, as proposed by the LMCC, will not work. The 420-450 MHz band is the second most used VHF/UHF Amateur Radio allocation. The loss of these frequencies will cause severe disruption to the mission of Amateur Radio, as specified in C.F.R. Title 47 Part 97.1, and will render severe harm to the Amateur's ability to support numerous government and non-profit relief agencies.

I respectfully request that you DENY the request of the LMCC to share the Amateur radio allocations at 420-430 and 440-450 MHz. Instead, I request that the Commission restore Amateur Radio's historic co-primary status in the entire band 420-450 MHz.

Sincerely,

David W. Murphy, K5FOY  
P. O. Box 602  
Mountain Home, AR. 72653

May 26, 1998

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May 22, 1998

File Number: RM-9267

JUN 1 1998

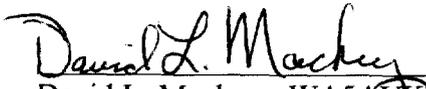
Office of the Secretary  
Federal Communications Commission  
Room 222  
1919 M Street NW  
Washington, DC 20554

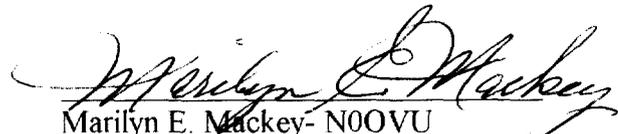
FCC MAIL ROOM

Dear Sirs,

On April 22, the Land Mobile Communications Council 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, for a variety of public service and public interest communications. The reallocation proposed by LMCC is incompatible with these operations. As a licensed radio amateur for 35 years, I am dismayed by the LMCC proposal. The loss of these allocations would impact our community in a very negative manner. These frequencies are used very heavily today for repeater links, remote base stations, and coordinated voice, video, and data communications associated with public safety. This is especially true here in the Dallas, Texas area for weather and storm activities. *Any impact to the ability to coordinate weather activities via 420Mhz Links and 440Mhz Remote Bases will get you a great deal of public attention here in the Mid-Americas during storm season.* Please file my strong opposition to RM-9267 and suggest the LMCC review their planning and proposal for a different allocation space/frequencies.

Thank You,

  
David L. Mackey - WA5AVK  
Tandy Corporation/TechAmerica Inc.

  
Marilyn E. Mackey- N0OVU  
Self

cc. LMCC Members (22 listed)

**Association of American Railroads (AAR)**  
50 F Street, NW  
Washington, D. C. 20001  
202-639-2100

**American Association of State Highway and Transportation Officials (AASHTO)**  
444 North Capitol Street, NW, Ste. 249  
Washington, D. C. 20001  
202-624-5800

**American Automobile Association (AAA)**  
1000 AAA Drive  
Heathrow, FL 32746

**American Mobile Telecommunications Assn. (AMTA)**  
1150 18th St., NW, Suite 250  
Washington, D. C. 20036  
202-331-7773

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**American Petroleum Institute**

1220 L Street, NW  
Washington, D. C. 20005  
202-682-8000

**American Trucking Associations, Inc. (ATA)**

430 1st Str. SE  
Washington, D. C. 20003  
202-544-6245

**Association of Public Safety Communications Officials-International, Inc. (APCO)**

2040 S. Ridgewood Avenue  
South Daytona, FL 32119-8437  
904-322-2500

**Cellular Telecommunications Industry Assn. (CTIA)**

1250 Connecticut Ave., NW, Suite 200  
Washington, D. C. 20036  
202-785-0081

**Central Station Alarm Association (CSAA)**

440 Maple Avenue East, Suite 201  
Vienna, VA 22180  
703-242-4670

**Forest Industries Telecommunications (FIT)**

871 Country Club Road, Suite A  
Eugene, OR 97401  
503-485-8441

**Forestry-Conservation Communications Association (FCCA)**

301 N. Lamar Street, Suite 300  
Jackson, MS 39201  
601-354-6008

**Industrial Telecommunications Association, Inc.**

1110 N. Glebe Rd., Suite 500  
Arlington, VA 22201  
703-528-5115

**Intelligent Transportation Society of America (ITSA)**

400 Virginia Avenue SW, Suite 800  
Washington, D. C. 20024

**International Association of Fire Chiefs**

4025 Fair Ridge Drive  
Fairfax, VA 22033  
703-273-0911

**International Association of Fish & Wildlife Agencies (IAFWA)**

444 North Capitol Street, NW, Suite 544  
Washington, D. C. 20001  
202-624-7890

**International Municipal Signal Association**

165 East Union Street  
Newark, NY 14513-0539  
315-331-2182

**International Taxicab and Livery Association**

3849 Farragut Avenue  
Kensington, MD 20895  
301-946-5700

**Manufacturers Radio Frequency Advisory Committee**

1041 Sterling Rd. #106

Herndon, VA 20170

703-318-9206

**National Association of State Foresters**

444 North Capitol St. Suite 540

Washington, D. C. 20001

202-624-5415

**Personal Communications Industry Association**

500 Montgomery St. Ste. 700

Alexandria, VA 22314

703-739-0300

**Telecommunications Industry Association (TIA)**

2500 Wilson Boulevard, Suite 300

Arlington, VA 22201-3834

703-907-7700

**UTC, The Telecommunications Association (UTC)**

1140 Connecticut Avenue, NW, Suite 1140

Washington, D. C. 20036

202-872-0030

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Federal Communications Commission  
1919 M Street N.W.  
Washington DC 20554

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Reference: RM-9267

I would like to add my voice to those of other amateur radio operators I am sure you are hearing from. My call letters are KC7KJX. I got involved in citizen band radio when a license was required. Then virtually every one began making and selling radios, the channels went from an 23 which seemed like plenty, to 40 which I was sure would provide the ability to get a free channel. Of course with the popularity along came the attention those less desirable persons, which have little concern for others. Profanity became rampant, illegal amplifiers were and are run virtually unchallenged, and today the CB channels are totally out of control. A virtual waste land. I believe in following rules and politeness so I left CB radio but often have wished to have the convenience back.

I became a HAM operator only 2 years ago. The enticing element for me was, higher cost equipment, a license required (to keep the riffraff out), more frequencies, more legal power allowed and especially the Amateur Radio philosophy, and that it could not be used for hire. Here are a group of people that volunteer their time and equipment to provide communications in emergencies and the only reward they get is the satisfaction of helping others. It is through amateur radio operators experimentation that repeaters, and autopatch equipment joined together to give birth to the cellular phone explosion we are now experiencing. Looking at the list of LMCC members I note several public services that have reaped the benefits of Amateur radio. In our local area HAMs use these very frequencies now requested to do flood watch, and search and rescue work. We have a local repeater network that is all linked via the 70cm band covering the entire state of Washington, on one frequency. I mainly work the 2-meter band but my next radio was going to be dual band, which would include the 420-450 band. I plan to expand my capability in the future so that I can be of more use, as my time becomes more available for public service.

In aviation we have used the same frequency band for many years, and each time a need for more room became apparent, improving the radios, not expanding the band has satisfied it. This has relegated some equipment to museums but that has been the only loss, the radio manufacturers haven't minded. I feel that technology can and should answer these current needs.

I know you are under pressure to satisfy many different groups. My only request is that you carefully consider the consequences to people like myself and other public minded persons. I feel it is important to continue to provide the all the current amateur bands so as to encourage experimentation and public service. Thankyou for continuing the battle to make the best use of our limited resources.  
PS. Don't ever drop the licensing requirements for HAMs.

Thank You  
Chuck Cox  
KC7KJX



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List A B C D E 0 E T

From: w6ea  
Full-Name: Arthur V Enockson  
To: FEDERAL COMMUNICATIONS COMMISSION , Washington D.C. 20554  
X-Status: New

In the Matter of

Proposed Reallocation of >  
420 to 430 MHZ from the Federal > RM 9267  
Government to the Private >  
Mobile Radio Service. >

Dear Sir:

I am Arthur V. Enockson W6EA. I have been a amateur radio operator for 65 years.

Active on all bands and modes. I also teach classes on radio communications, theory and code.

When I was first licensed, there were less than 40,000 licensed amateur radio operators in the U.S.A. Today there are more than 800,000.

Many of the new amateurs are of the "no code" level of licensing limiting them to the 144.000, 220.000 and 440.000 frequency bands along, with the old timers.

The new amateurs as well as the old amateurs use the 440.000 MHZ for "communication " and also for "public service" and "emergencies". California is known for our earthquakes and fires. Most recently, El Nino with fires and flooding.

I've personally experienced diasterous emergency conditions and the vital need for communications over the years.

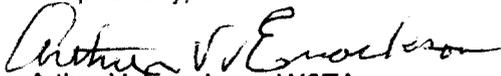
In my local area, packet radio, and RACES programs are used around the clock to maintain flawless communications on a daily basis. These modes of operation utilize the 220.000 and 440.000 frequency spectrum.

All the amateur radio bands today, are over crowded pending propogation and licensing, and we the amateurs are to "give up" frequencies or "share" with Private Mobile Service? NO WAY is my personal logic on this matter!

I certainly hope the F.C.C. see's and understands this critical situation and decides to allow the Amateur bands to remain as they are.

As time go's on, and due to the population explosion throughout the world, more amateur radio frequencies will be required to lessen interference within our bands

Respectfully,



Arthur V. Enockson W6EA  
6822 Crescent Ave.  
Buena Park Ca. 90620-3756

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1998  
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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

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- Fire departments of Clark County, Washington
- City of Vancouver Fire Department, Vancouver, Washington
- Clark County Sheriff's Office
- Clark County Public Utilities District
- Clark County chapter of the American Red Cross
- Washington State Department of Transportation

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.

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Sincerely,



Donald W. Peter, ND7P  
9400 NE 110th Ave.  
Vancouver, WA 98662

May 25, 1998