

FCC MAIL ROOM

JUN 1 1998

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18615 N.E. 29th Ave  
Ridgefield, WA 98642  
May 28, 1998

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

Re: 440 band  
RM-9267

Ladies & Gentlemen:

I am writing in opposition to the proposal that the Land Mobile Service have access to the amateur radio allocation in the 420-450 Mhz band. This proposal by the LMCC is incompatible with the use of that frequency spectrum by amateurs.

I am the ARES District Emergency Coordinator for four counties in Southwest Washington (Clark, Cowlitz, Skamania, and Wahkiakum). Additionally I am the ARES Emergency Coordinator for Clark County and the RACES Radio Officer for both Clark and Skamania Counties. The organizations which I lead are engaged in the primary purpose of amateur radio recognized in Part 97 of the CFR, which is to provide public service communications, particularly in emergencies.

As do the vast majority of ARES and RACES groups, we provide communication services to cities, counties, state agencies, fire districts, federal agencies, and a number of private organizations such as the American Red Cross. We are quite active in our services, having provided critical communication services in a number of emergency situations (floods, windstorms, etc.).

The use of the so-called 440 band is critical to our operations. We use it for both simplex and repeater operation and for cross-band communication where appropriate. The loss of this frequency allocation would severely cripple our ability to carry out our duties.

The amateurs I lead provide hours and hours of services, day after day, week after week, and month after month. They have invested substantial sums in purchasing their equipment. All of their services, and the use of their equipment, at absolutely no cost to

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Federal Communications Commission  
Re: 440 band  
May 28, 1998  
Page 2

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the agencies and organizations served. These members, many of whom are students and many of whom are retired, have acquired this equipment over the years, as finances permitted.

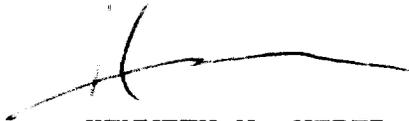
The reallocation of this band, should it occur, will destroy their investment in equipment. It will be years before my members can replace this equipment. In the meantime, our ability to fulfil our duty as public service communicators will be severely impaired.

Not only have the amateurs purchased their own equipment, but several agencies, such as the local hospital and the local county emergency services department, have established base stations using 440 equipment so that it is immediately available to manned by amateurs when needed. The reallocation of the 440 band will destroy this investment of both public and private funds. It has taken years to get these agencies to budget and invest the funds necessary to establish these stations. Again, it will be years before these investments can be replaced.

Our local ARES/RACES group has received numerous commendations and letters of gratitude for our services. These awards have been received from diverse groups such as the City of Vancouver, the County of Clark, Clark County Emergency Services, Red Cross, and the Clark County Sheriff. In each instance our use of the 440 spectrum was an important part of our ability to deliver the services. In each instance the public and private agencies recognized the substantial savings to them by the free services furnished by us.

Please do not destroy our ability to discharge our responsibility under Part 97. Please do not reallocate the band.

Sincerely,



A handwritten signature in black ink, appearing to read 'K. W. Weber', with a long horizontal stroke extending to the right.

KENNETH W. WEBER

# Gratiot County Amateur Radio Association

FCC MAIL ROOM

917 Mill Street

Alma, Michigan 48801

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May 25, 1998

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

Dear Sirs:

We have just learned that the Land Mobile Communications Council (LMCC) has filed a petition (designated RM-9267) that seeks to reallocate the radio frequency bands 420-430 MHz and 440-450 MHz for use by the Private Mobile Radio Service (PMRS). These bands are now heavily used by licensed radio amateurs, operating in the Amateur Radio Service, for public service and emergency communications. The reallocation proposed by LMCC would seriously hamper our operations.

The Gratiot County Amateur Radio Association represents over 70 licensed amateurs in Gratiot and Isabella Counties. Each of us typically has invested several thousand dollars in radio equipment that we use during communications emergencies. As licensed amateurs, we are trained and disciplined in radio procedures, and we practice these procedures during routine disaster drills, so we can be prepared when disaster strikes. This training represents many thousand man hours of volunteer time.

Because we are trained, and our communication capabilities are robust, we can function when systems that depend on complex infrastructure become unusable. Cellular telephone and private mobile radio services work when their infrastructure is intact and lightly loaded, but they cease to be effective when their infrastructure becomes overloaded or fails, *as almost always happens during large-scale emergencies*. During disaster drills with local public service organizations, we have been praised for our ability to pass traffic when other communications channels (telephone, cellular telephone, and police, fire, and hospital radio communications) become congested.

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(over)

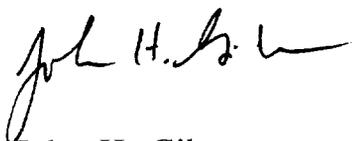
In its petition LMCC misinterprets our current status on these frequencies. At present amateurs are secondary only to military radiolocation (radar) in the 420-450 MHz band. Limited non-government, non-amateur use of the band is permitted, *but amateurs currently have priority over such use.*

LMCC's suggestion that amateurs be given spectrum at 1390-1395 MHz and 1427-1432 MHz to compensate for loss of most of the 420-450 MHz band is disingenuous, because although most amateurs have substantial personal investment in radio equipment, most also have modest incomes and cannot immediately buy or build the new radios that would give access to these new frequencies.

The spectrum grab proposed by LMCC would deprive us of frequencies that we need and depend on to perform vital public services. Were the government to buy the radio equipment and train and support the personnel needed to replace the amateurs' equipment and training, the initial cost would easily exceed a million dollars in Gratiot County alone.

Thank you for your attention to this vitally important matter.

Sincerely,



John H. Gibson  
Amateur radio call sign NO8V  
President  
Gratiot County Amateur Radio Association

Reference: File #RM-9267

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JUN 1 1998

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Altus Area Amateur Radio Association  
FCC Club License AJ5Q  
PO Box 73  
Altus Oklahoma 73521

May 24, 1998

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

Dear Gentlemen & Ladies:

We are writing to express our concern regarding the current threat to the 70cm band by the Land Mobile Communications Council, otherwise known by you as Petition #RM-9267. Our organization works closely with the National Red Cross and other governmental and non-governmental disaster organizations in providing emergency communications in time of severe storm and tornado threats in the area.

We understand the importance of providing additional bandwidth to the LMCC for expansion. However, their proposal to allocate the 420-430 and 440-450 Mhz bands to Private Mobile Radio Services and place Amateur Applications in this range as secondary to PMRS is entirely unacceptable. Enactment of this proposal would wreak havoc on our emergency communications network and may cause an unnecessary threat to life and limb for our local residents.

As you know, the 70cm band was originally allocated for amateur use and secondary status was given to amateur use during the 1950s when Cold War concerns made national security a high priority. Amateurs were given secondary status to military radio-location (radar) only. Limited non-government, non-amateur use of the band is permitted, but amateurs currently have priority over such use. This proposal would turn the world upside-down, due to the LMCC's misinterpretation of the significance of amateur secondary status. Amateur radio should NOT become secondary to PMRS, this is against the very principle of your organization.

If the PMRS needs additional bandwidth, then perhaps they should be allocated the 1390-1395/1427-1432 Mhz that they are proposing amateur operations move to. As you know, our service is entirely voluntary and privately funded by radio amateurs. Requiring the purchase of additional equipment on our part to satisfy their needs is unjust and unnecessary. Surely there is a better answer than the one proposed by RM-9267.

Sincerely,



Alan Snider, KD5COH, Club Secretary  
Altus Area Amateur Radio Association

This letter was written on behalf of the forty-four AAARA Club Members listed on the enclosed roster as well as the many other duly licensed radio amateurs of Southwest Oklahoma.

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## Altus Area Amateur Radio Association Membership List

**Allison Tonya**

1525 Debby St  
 Altus OK 73521 (580) 482-6242  
 Call Sign: KD5BNN Class: Tech Expires: 6/30/2007

**Aslett John**

101 N. Main  
 Roosevelt OK 73564 (580) 639-2213  
 Call Sign: KC5HUV Class: Tech Plus Expires: 7/14/2004

**Barker "Doc" Charles**

PO Box 658  
 Hobart OK 73651 (580) 726-3623  
 Call Sign: KM5IO Class: Advanced Expires: 3/2/2003

**Barker Birttie**

PO Box 658  
 Hobart OK 73651 (580) 726-3623  
 Call Sign: KC5OAG Class: Tech Expires: 4/19/2005

**Branam Johnny**

504 S. Main / 1021 W. 3rd (res)  
 Hobart OK 73651 (580) 726-2585  
 Call Sign: KM5HN Class: Advanced Expires: 9/21/2003

**Brown Michael T-Sgt**

8915 Blue Herron Dr  
 Wichata Falls TX OK 76302 (000) 000-0000  
 Call Sign: KK5ZB Class: Advanced Expires: 5/25/2003

**Bryan Jerry**

Box 98  
 Tipton OK 73570 (580) 667-5366  
 Call Sign: WB5LTU Class: General Expires: 6/27/2006

**Burnett Robert**

509 Hughes PO Box 127  
 Blair OK 73526 (580) 563-9683  
 Call Sign: KC5NAZ Class: General Expires: 3/8/2005

**Burton N.J.**

300 S. Ohio  
 Hobart OK 73651 (580) 726-2710  
 Call Sign: N5WNK Class: General Expires: 10/1/2001

**Burton Ruth**

300 S. Ohio  
 Hobart OK 73651 (580) 726-2710  
 Call Sign: KC5NAY Class: Tech Expires: 3/8/2005

**Casey Robert**

Rt1, Box 380  
 Altus OK 73521 (580) 482-7437  
 Call Sign: KC5CNC Class: Tech Plus Expires: 8/31/2003

**Clark Keith**

924 E. Sutherland  
 Altus OK 73521 (580) 477-4534  
 Call Sign: KF4MRK Class: Tech Expires: 10/19/2006

**Cowles Dottie**

Rt1, Box 159-A  
 Lone Wolf OK 73655 (580) 846-5498  
 Call Sign: KC5EEO Class: General Expires: 11/23/2003

**Cowles Ralph**

Rt1, Box 159-A  
 Lone Wolf OK 73655 (580) 846-5498  
 Call Sign: KC5CNB Class: Tech Expires: 8/31/2003

**Cramer Fred**

1105 E. Oakhurst  
 Altus OK 73521 (580) 477-3089  
 Call Sign: KC5SRJ Class: Tech Expires: 2/2/2006

**Cramer Janice**

1105 E. Oakhurst  
 Altus OK 73521 (580) 477-3089  
 Call Sign: KD5BNO Class: Tech Expires: 6/30/2007

**Dennis Dwight**

1701 Oxford Dr  
 Altus OK 73521 (580) 000-0000  
 Call Sign: WB5KRH Class: Tech Expires: 5/17/2004

**Gabbard Ed**

1301 Scott St  
 Altus OK 73521 (580) 477-4679  
 Call Sign: KD5DPK Class: Tech Plus Expires: 8/11/2002

## Altus Area Amateur Radio Association Membership List

**Glidewell Ron**

RR1, Box 89  
 Roosevelt OK 73564 (580) 639-2653  
 Call Sign: KC5ZGX Class: Tech Expires: 3/6/2007

**Hanna Donnie**

1012 E. Liveoak  
 Altus OK 73521 (580) 000-0000  
 Call Sign: KC5MKZ Class: Tech Expires: 2/3/2005

**Hardy Jr**

1103 N. Willard  
 Altus OK 73521 (580) 482-0725  
 Call Sign: KC5MLA Class: Tech Expires: 2/3/2005

**Houska Cheyenne**

PO Box 104  
 Duke OK 73532 (580) 679-3816  
 Call Sign: KD5AFI Class: Tech Expires: 4/28/2007

**Houska Travis**

PO Box 104  
 Duke OK 73532 (580) 679-3816  
 Call Sign: KC5SRK Class: Tech Expires: 2/2/2006

**Hughes Ron**

RR1, Box 192  
 Altus OK 73521 (580) 482-7994  
 Call Sign: KBSUVK Class: Tech Expires: 8/18/2002

**Locke David**

RR1, Box 204  
 Altus OK 73521 (580) 482-8625  
 Call Sign: KC5SII Class: Tech Expires: 1/12/2006

**Locke Theresa**

RR1, Box 204  
 Altus OK 73521 (580) 482-8625  
 Call Sign: KC5TTD Class: Tech Expires: 4/4/2006

**Mahan James**

1361 Canterbury  
 Altus OK 73521 (580) 482-2926  
 Call Sign: KC5OEY Class: Tech Expires: 5/1/2005

**Mateyko Donna**

203 School St, PO Box 27  
 Martha OK 73556 (580) 266-3357  
 Call Sign: KB5YWR Class: Tech Expires: 3/2/2003

**Mateyko George**

203 School St, PO Box 27  
 Martha OK 73556 (580) 266-3357  
 Call Sign: N1GM Class: Extra Expires: 4/8/2007

**Mateyko Yvonne**

203 School St, PO Box 27  
 Martha OK 73556 (580) 266-3357  
 Call Sign: KC5JXR Class: Tech Expires: 9/27/2004

**Molledahl James**

320 Saturn  
 Altus OK 73521 (580) 482-5308  
 Call Sign: AB5FS Class: Extra Expires: 5/12/2002

**Reuter Dave**

1509 N. Willard  
 Altus OK 73521 (580) 482-3982  
 Call Sign: KB5SYL Class: Tech Expires: 6/2/2002

**Reuter Mike**

908 E. Nona  
 Altus OK 73521 (580) 482-7041  
 Call Sign: KB5ZCL Class: Tech Expires: 3/9/2003

**Richards Owen**

215 E. 2nd, PO Box 371  
 Blair OK 73526 (580) 000-0000  
 Call Sign: AB5VF Class: Extra Expires: 9/7/2003

**Rochelle Jerry**

513 Saturn  
 Altus OK 73521 (580) 482-6636  
 Call Sign: K5QM Class: Extra Expires: 5/20/2007

**Roman Ron**

1209 E. Hickory  
 Altus OK 73521 (580) 482-8446  
 Call Sign: KD5CYW Class: Tech Expires: 12/24/2007

## Altus Area Amateur Radio Association Membership List

### Schenkel Ann

Rt1, Box 140B

Lone Wolf OK 73655 (580) 846-5578

Call Sign: KA5YWY Class: Tech Plus Expires: 12/14/2005

### Town Gene

3111 Partridge Place

Altus OK 73521 (580) 482-8487

Call Sign: KC5PAV Class: Tech Expires: 6/5/2005

### Schenkel Mike

Rt1, Box 140B

Lone Wolf OK 73655 (580) 846-5578

Call Sign: W5VXU Class: General Expires: 9/29/2002

### Town Lil

3208 Gettysburg

Altus OK 73521 (580) 477-4027

Call Sign: KC5CNA Class: Tech Expires: 8/31/2003

### Snider Alan

Box 846

Burns Flat OK 73624 (580) 477-2250

Call Sign: KD5COH Class: Tech Expires: 11/3/2007

### Spencer Richard

3220 Quail Circle

Altus OK 73521 (580) 482-4353

Call Sign: WB5PUF Class: Advanced Expires: 6/14/2006

### St. Clair Wes

2309 Cherokee Strip

Altus OK 73521 (580) 477-1519

Call Sign: KC5TTE Class: Tech Expires: 4/4/2006

### Town Dale

3208 Gettysburg

Altus OK 73521 (580) 477-4027

Call Sign: N5VX Class: Extra Expires: 3/27/2007

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May 28, 1998

JUN 1 1998

Before the FEDERAL COMMUNICATIONS COMMISSION

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Washington, D.C. 20554

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

To: The Secretary,

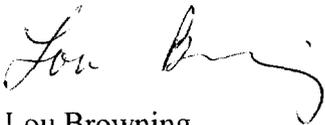
Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

I am a amateur radio operator and an emergency communications control officer on Hatteras Island, North Carolina. My responsibility is supplying emergency communications to state and local government. I do not believe that private land mobile and amateur operations can use the same spectrum successfully. The most flexible and free communications service to help the public in times of disaster is amateur radio. Please don't blow it for the American Public.

I respectfully request that you DENY the LMMC proposal in RM-9267 to share the Amateur Radio allocations at 420-430 and 440-450 MHz."

Thank You,



Lou Browning  
PO Box 275  
Frisco, NC 27936

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

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 )

I am William Blackburn, an active Amateur Radio operator and a citizen of the United States. On the basis of my Amateur Radio interests and investments, as well as a citizen concerned that spectrum is used in the best public interest, the following comments are offered:

1. Amateur Radio has unquestionably demonstrated time and again the required emergency preparedness and training necessary to provide critical communications in times of disasters and emergency needs. THIS CAPACITY SHOULD NOT BE REDUCED BY A SPECTRUM TAKE AWAY.
2. LMCC has not demonstrated a need for additional spectrum over and above that additional channeling to be provided with incorporation of the FCC's rulemaking on Refarming. IT IS PREMATURE TO CONSIDER ADDITIONAL RULEMAKING TO TRANSFER SPECTRUM UNTIL THE ACCOMPLISHMENTS OF "REFARMING" ARE COMPLETED.
3. Previous efforts and FCC rulemaking to transfer spectrum from the Amateur bands ( 220 MHz Rulemaking) continue to be questionable in accomplishing the best serving of the Public Interest. WITH PORTIONS OF THE REALLOCATED 220 MHz BAND REMAINING UNUTILIZED, THERE IS NO MERIT TO THE REQUEST TO TRANSFER ADDITIONAL SPECTRUM FROM THE AMATEUR SERVICE TO THE PRIVATE RADIO SERVICE.

In consideration of the above, the Public Interest will best be served by the FCC's dismissal of the instant petition.

Respectfully submitted for consideration,

*William Blackburn*  
William Blackburn, K4GBG 5/27/98

*O&Y*  
*OET*

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JUN - 11 1998

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DOCKET FILE COPY ORIGINAL

Comments on file: RM-9267

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

*May 24, 1998*

To: FCC Commissioners,

The proposed RM-9267 from the Land Mobile Radio Services (LMCC) pertaining to the 420-430/440-450 MHz bands I feel is a threat to some of the communications that Amateur Radio Operators provide for the community. The range 440-450MHz is used by repeaters that provide SkyWarn (storm warnings and reports) in the 17 counties of Southeastern Michigan. The SkyWarn operation is a valuable operation in conjunction with the Nation Weather Service (NWS) where Amateur Radio operators are on duty during storms at the NWS. The reason that the 440-450MHz is used is because of the lack of frequencies available on other allocations that are part of the Amateur Radio bands and lightning static is not as prevalent at this higher frequency. A problem that will worsen if this proposal is passed is over crowding of Amateur Radio Spectrum because of forced movement due to interference from the LMCC service. I know presently that the Amateur Radio operations in the 420-430/440-450MHz are secondary to government operations and has easily worked out because the government has very few operations in this range. If the band is given to LMCC there will be much interference because of their projected use. Thus, I ask that you not allow RM-9267 go any further where it threatens the Amateur Radio Spetrum of 420-430/440-450MHZ.

Thank You  
Mark Dabish, K8MD

*Mark Dabish*

Mark Dabish  
2328 Fisher CT  
Howell, MI 48843  
Livingston County

Number of copies recorded 5

DATE DET

**Peter Wang**



Silent Star Court ◆ Houston, Texas 77095-4454 ◆ U.S.A.  
Voice-mail (713) 813-0705 ◆ Email KF5ND@flash.net

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JUN - 1 1998

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May 24, 1998

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

DOCKET FILE COPY ORIGINAL

**File number: RM-9267**

Dear Sir or Madam,

The proposal by the Land Mobile Communications Council (LMCC), designated RM-9267, to reallocate portions of the 420 - 450 MHz band for the Private Mobile Radio Service would certainly impact me personally as a Radio Amateur and personal user of this band. Given the widespread popularity of so-called "dual-band" transceivers (144 - 148 MHz and 420 - 450 MHz), it is clear that the Amateur Service renders important public service and technical training benefits to the nation through the use of these bands.

I urge you to reject this proposal.

Sincerely,



Peter Wang

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

FORM-9267  
FEDERAL COMMUNICATIONS COMMISSION

May 26, 1998

JUN 1 1998

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Dear Sir or Madam:

I am a licensed amateur radio operator (KF8QU). The recent request by LMCC to essentially take over the 420-450 MHz (70cm) band will not only cause me financial loss, but in addition will cause the federal government or the U.S. taxpayers or both additional money.

The Amateur Radio Emergency Service commonly uses the 70 cm band to handle emergency traffic. In central Ohio during the summer time these frequencies are especially important during the tornado season. A large number of amateur radio operators participate as weather spotters for the National Weather Service. Not only are these individuals trained in the proper use of their radio equipment, but they are also trained by the National Weather Service in matters of severe weather – i.e., how to identify dangerous weather patterns and how to convey that information to the weather bureau. In Columbus, Ohio, the Amateur Television in Central Ohio group is able to provide video reports of severe weather conditions through the use of mobile ATV which is operated on 70 cm. In addition, weather radar can be broadcast to the mobile amateurs so that they can quickly identify those areas that are most likely to require further investigation. These individuals are all volunteers and do an outstanding job – all without any monetary reward! If the 70-cm band were to be lost to commercial interests through something like the RM-9267, the government would have to either:

- 1.) find funding to pay for training and operation of a similar network to handle emergency communications for weather and other natural disasters.
- 2.) do nothing – thus endangering the lives of all citizens.

The ATCO group also helps the Columbus police department with crowd control during one of the largest fireworks displays in the country (Red White and Boom) on July 4<sup>th</sup> weekend. Again, the 70cm band is used to convey television pictures to the Columbus police for crowd control.

The above examples only mention a few direct examples of how amateurs use 70-cm to provide emergency communications. Other applications include packet radio communications and link repeaters. If these frequencies were to be taken from the amateur community, then the remaining frequencies would become even more crowded. And, there are many repeaters already set up and operating. The equipment is operated on a daily basis so that in times of emergency it can always be ready to go. Again, if these were to be removed and the amateurs decided to somehow use a different frequency, then there would be many hours if not months of time to re-build the repeater systems. Frequency allocations would have to be made which would exhaust valuable time. Funds would have to be raised by the amateur community to purchase new equipment. A lot of this equipment is built from old parts obtained from "hamfests."

Bob Tourmoux  
3569 Oarlock Court  
Hilliard, Ohio 43026-5702

RM-9267

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**RM-9267**

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

May 26, 1998

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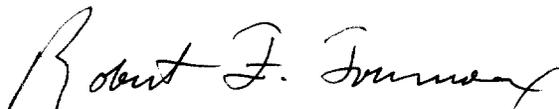
To replace the working equipment could very well cost 20 to 30 times or more what the amateur community has invested financially. Over the years a great number of dedicated amateurs have been able to build up an impressive series of repeaters to cover many areas of the country so that in times of weather emergency those individuals and their equipment can help save property and lives.

I believe that amateur radio is an excellent path for the younger citizens to gain interest in science. I see a constant growth in our country away from the sciences and into sports – all fine and dandy, but what will happen when the US can no longer provide skilled engineers and scientists? If we start taking away bands from the amateur community, then we will lose even more young hams – potentially more scientists. The hobby has recently just re-kindled itself – taking away bands now will surely quench that new youthful interest.

For me personally, losing the 70cm band would cost upwards of \$1000.00. In fact, because of deed restrictions which prevent me from having a tower, I cannot easily operate on the HF bands. However, I can operate 70 cm with a small telescoping mast planted in the ground. So, if I have to give up 70cm, then I would lose most of my hobby.

So, if anyone is listening, please hear my plea. Don't take away the 70cm band – no part of it!

Regards,



Bob Tournoux / KF8QU

---

Bob Tournoux  
3569 Oarlock Court  
Hilliard, Ohio 43026-5702

**RM-9267**

May 26, 1998

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

Re: RM 9267

From: Alvin Banman, WN6EKZ  
333 San Francisco  
Pomona, CA 91767

I believe that there are many scientific benefits of an Amateur Radio service across the RF spectrum. It is important that this equilibrium not be upset by taking away any part the assigned frequencies including any part of the 420-450 Mhz. band. Any such re-allocation will not only be harmful to our country in an immediate sense, but harmful to the longer future of technological radio development! This proposal would if enacted remove an area of spectrum where fundamental signal research is done, as well as portions where point to point linking is done for both practical emergency as well as scientific work is accomplished.

I am not only an active user of this band, but a Red Cross Disaster Action Team volunteer. I know first hand the importance of the Amateur Radio community assisting in the time of disasters. A loss of any the assigned frequencies including the 420-450 Mhz. band would hamper the disaster assistance that amateurs provide.

Please deny all requests in RM 9267.

Thank you for your consideration,

Alvin Banman, WN6EKZ

*Alvin Banman*

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May 26, 1998

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

Enclosed is eleven copies of a letter. Please distribute a copy to each F.C.C. Commissioner.

Thank you!

*Douglas L. Stanfield*

Douglas L. Stanfield.  
Amateur Radio Station WA6ATE.  
FCC Commercial License Number PG-11-9247.  
2058 Avenida Placida #4  
Simi Valley, Ca.  
93063.  
Enclosures.

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FEDERAL ROOM

JUN 1 1998

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May 26, 1998

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

Dear Commissioner:

This communication is on the subject of the petition before the Commission, RM-9267. The petition itself is incorrect. It contains errors and omissions. One error is that the band is "generally popular on a secondary basis". This is not the truth. The entire band from 420MHz to 450MHz is heavily loaded with active Amateur Radio communications. The Land Mobile Communications Council is incorrect in stating that "equipment availability and technology would benefit" in removing frequency spectrum from the amateur UHF band and re-allocating such spectrum to commercial use. To remove spectrum from the Amateur Radio service would not promote technical advancement. It would hinder it by removing the very frequency spectrum that fosters the technical advancement.

The entire band is now heavily used for high technology Amateur radio, television, digital, satellite and microwave communications. The 420-450 MHz band currently hosts the largest radio-linked communications system in the world.

This system has been used numerous times for interstate emergency communications. Many smaller communications systems, two of which I support, have been used during local emergencies. One instance was the Big Bear and Landers Earthquakes in Southern California. The system that I helped to construct and currently operate and maintain, provided direct radio communications to the Big Bear area. The Radio "Remote Base" Ran on it's own emergency power for 24 hours while providing the only communications link between the San Bernadino County Red Cross and the Big Bear Two-meter Amateur "repeater". The communications were made possible by the 420-430MHz "link" transmitters and receivers in the system that allowed remote control and operation of the 448.650MHz repeater on the top of Bear Mountain. This allowed the Los Angeles County Emergency Communications Center to have complete control over the remote system, allowing them to conduct emergency operations. Their own extensive radio communications system could not communicate directly with the Big Bear area.

This same Amateur radio system was instrumental in providing emergency communications during the Northridge Earthquake. This was during the period where the entire Los Angeles area was without electrical power after the earthquake main shock and extensive aftershock sequence. Again, the system

located on the peak overlooking Northridge worked perfectly, providing communications capability while on emergency power.

These large and small communications systems are built, installed and maintained by Amateur Radio operators at their own expense. The systems occupy commercial radio buildings, operating side-by-side with commercial radio communications equipment. The systems are constructed from commercial grade professional communications components. The control of the equipment is accomplished by microprocessor controllers that were designed, built and programmed by Amateur Radio Operators. One of the radio systems that I support has an average \$10,000 dollar investment in UHF equipment in each of our five linked-radio installations. Each site consists of one cabinet with four receivers, four transmitters, 3 radio frequency filters, a microprocessor controller, three-hundred feet of High Grade "feedline" of various diameters, four antennas, and an emergency power source. All of this is professional quality equipment purchased from the very same suppliers that the commercial operators purchase from. The cost to operate these systems is high, because in many cases, we pay commercial rates for site rental in the same commercial buildings and on the same towers. Implementing this proposal from the Land Mobile Communications Council would, in one of the systems that I am a part of, cause the loss of over \$50,000 in equipment investment alone. The loss to the large interstate system mentioned above, would be measured in the Hundreds of Thousands of Dollars.

Congressman Elton Gallegly of Ventura County, California, has sent a letter from his office to all licensed Amateur Radio Operators in this county. He has given his support for Amateur Radio. Ventura County Emergency Services has used Amateur Radio operators to place and operate the County's portable emergency communications equipment so that the Fire equipment operators could communicate with the Dispatch centers. The local Police stations in Ventura County provide space for Amateur radio communications in their EOC's, Emergency Operating Centers. The County of Ventura has now shifted some of the local emergency communications duties that were performed by Ventura County personnel over to the Amateur Radio communications networks. We cannot remove any spectrum from Amateur Radio use. The City and the County would lose needed and expected emergency services.

The 420MHz to 430MHz bands in Southern California support more than just the "link" transmissions mentioned above for the 440MHz band. Due to the loss of the lower 2MHz of the 220MHz Amateur band a few years ago due to the "sale" of the frequencies to the United Parcel Service, the 420-430MHz band now must support the control and communications links for the 220MHz repeaters on the remaining 2MHz of the 220MHz Amateur band. These services were merged into the 420-430MHz band at great expense in time and equipment. Converting the

420-430MHz band to commercial use will not only cause the loss of control and communications to and between repeater systems on the remaining 2MHz of the 220MHz band, it will cause the same loss to the repeaters on the entire UHF Amateur band. The financial loss to the 220MHz band system operators will again be in the Thousands of Dollars.

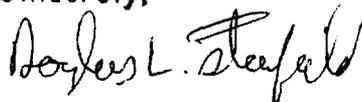
If all UHF Amateur Radio communications were compressed into their one 10MHz segment, all international Amateur Satellites would lose the use of their UHF "up" links. The only reason that the Land Mobile Communications Council is not proposing overtaking the frequency band between 430MHz and 440MHz is because of the presence of Amateur Satellite operations on that band that **ABSOLUTELY CANNOT BE MOVED**. This is a deception, because the Land Mobile Communications Council knows that no Amateur Radio systems for "compressed video television in the 430-440MHz band" would be installed by the Amateur Radio operators because of the effect of wideband television signals upon satellite receivers. The whole proposal is false.

Let the members of the Land Mobile Communications Council bear the cost of the development of "emerging technologies" on their existing poorly policed, out-of-control communications frequencies. Their operations would benefit greatly, the efficiency of the bands would increase, and the cost to all commercial operations would be greatly reduced. The UHF Amateur frequencies are **BUSY**, coordinated, policed and efficiently used. Theirs are not. Let the wasteful users of the existing commercial bands clean up their currently allocated bands first.

Check into our web site at:

<http://www.members.aol.com/rabbithmpg/index.html>. View for yourself an investment that will be lost if this proposal by the Land Mobile Communications Council is approved. This radio system has been in operation, in part or in whole for over twenty-five years. Please do not terminate this proud family tradition. Thank you for your time.

Sincerely,



Douglas L. Stanfield.

Amateur Radio Station WA6ATE.

FCC Commercial License Number PG-11-9247.

2058 Avenida Placida #4

Simi Valley, Ca.

93063.

Cc: Office of the Honorable Congressman Elton Gallegly.

## Comment on Proposed Rulemaking

DOCKET FILE COPY ORIGINAL  
file no. **RM-9267**

With regard to the Proposed Rulemaking, RM-9267, before the FCC

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An Allocation of Spectrum for the Private Mobile Radio Services

JUL 1 1998

Submitted by the Land Mobile Communications Council

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

I am a licensed amateur radio operator and member of several amateur radio organizations: the American Radio Relay League (the national amateur radio organization, the Dulles (area in Northern Virginia) Amateur Radio Group, or DARG, and the Sterling Park (Virginia) Amateur Radio Club.

As the FCC will, no doubt, receive numerous comments with regard to the technicalities and legalities of the proposed re-allocation in the 420-450 MHz band(s), I would like to address the following points:

1. The proposal ignores the present activity and effective status of the operations on the band.
2. The proposal inaccurately portrays that activity as merely non-government, non-commercial, casual research and general communications that are casual and unnecessary, given recently available means of person-to-person communication.
3. The "constriction" (word from the proposal) on amateur use of the band resulting from this proposal would in actual fact result in incompatible usage of the band by two very different user groups.

I submit that these points argue convincingly that the FCC should, if it must determine a new and novel sharing of this spectrum by more than one user group, another scenario is both available and preferable.

The proposal describes only briefly the amateur activity on this band as secondary in status to government use and certainly secondary to the proposed use by LMCC member organizations.

This spectrum was once a primary allocation to amateur radio. The Cold War and resulting needs for federal government work with available technology caused the FCC to change that allocation to primary for the government and secondary for the amateurs. These two groups have coexisted successfully for decades.

The amateur use of this spectrum is the second most popular among all amateur allocations by US amateurs, according to the ARRL. Activity ranges from satellite communication research, to weak signal propagation study, to wireless amateur networking (that pre-dates the rise of the Internet and contributed to its development), and land-based communication point-to-point using simplex and repeater pairs of frequencies.

With over 200,000 licensed amateurs able to operate on this band and enormous resource for community service and disaster relief exists, at virtually no cost to government entities.

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Removal of this spectrum and "relocating" amateurs to other band(s) would destroy this resource in two ways: First, modifying and rebuilding repeater equipment wholesale is beyond the reach of limited funds available to amateur organizations for this purpose. Second, once it is clear that amateur allocations are in no ways considered of prime importance and are, therefore, subject to change from time to time, the majority of amateur operators will decide the prospect of continually buying new equipment is not worth the cost.

The record of service in emergencies by amateurs is ample and well known. The FCC must determine, within the scope of its authority, just how important amateur radio is in emergencies and how to ensure that licensees will commit to provide this service over the long term. I submit that making amateur use of this spectrum secondary to land mobile users is not the way to accomplish this.

This spectrum is a tremendous resource for teaching young students hands-on about orbital mechanics, RF propagation, and antenna design and receiver technology. This goes on every day in schools across the country with "amateur radio in the classroom" programs, radio cub activity and direct astronaut to student communications from the Shuttle and MIR, coordinated by NASA and the ARRL.

I personally led a group that introduced amateur radio to the eighth grade science class at Farmwell Station Middle School, in Ashburn, Virginia last year. We plan to expand this to other middle schools in our county in the coming months.

It should be remembered that this work is carried on by volunteers with their own equipment, purchased at their expense. It would be naïve to assume that changing band allocations would simply move amateurs involved in education to go out and buy entire new setups at over \$1,000.00 per person (often more).

It should also be remembered that the extent of schools activity is hard to quantify because the FCC has only recently allowed "station licenses" to be issued in the name of the school or club doing the teaching.

It should also be remembered that the telecommunications industry, the very area of our economy whose development the FCC is expected to nurture, or avoid impeding, predicts a shortage of 200,000 or more RF engineers by 2010. Amateur radio is the only national and international arena where potential engineers can become interested in the pursuits described above and to learn hands-on and prepare for rigorous study of them in post high school settings. The 420-450 MHz spectrum is an essential part of any effort to combat the predicted engineer shortage, unless the country will invent elsewhere what amateur radio already provides.

It is clear that present use of the band under consideration is robust and provides many benefits to local governments, national emergency preparedness, and toward meeting national education goals.

Amateur radio use of spectrum is occasional, and event oriented. Hence the impression that the LMCC may have drawn that the 420-450 MHz spectrum is underutilized. As amateurs do not use the spectrum for business, traffic patterns look somewhat erratic, or even haphazard to an outsider looking in, so to speak. But the pattern of use does not change the vital nature of that use. From amateur television in

the classroom, to wireless packet networks for teaching and emergency communications to conversations over satellites and with the Space Shuttle, amateur radio in this spectrum is worthy of preservation, and not easily duplicated in other bands, for a myriad of reasons.

Proposed sharing of this amateur spectrum with land mobile interests invites incompatibilities and in short, won't work.

Amateur operators must show technical competence in order to use the spectrum and be licensed. Actual land mobile operators, by and large, are not licensed, and pursue use of radio as part of business or other pursuits usually not related to radio and RF study. In an emergency, when FCC dictated priorities on spectrum use take effect, there would be no guarantee that these users would relinquish frequencies for public service as would be expected by those depending on amateur radio.

Amateur use is noncommercial. Land mobile use is commercial, or institutional. It is unfair to ask a commercial entity whose income depends on communications to step aside to let amateurs pursue and coordinate a satellite/Shuttle contact. It is unrealistic to assume the actual operators in a commercial setting would effectively cooperate.

If a sharing of this band between amateurs and another service becomes necessary, there is a better idea. Both broadcasters and amateurs pursue use of spectrum as part of their free speech rights. Both broadcasters and amateurs are technically oriented and realize that communications quality is vital to their pursuits. Both broadcasters and amateurs should not be expected to "buy" their spectrum because of the free speech aspect of their spectrum use.

Broadcast use of auxiliary (non-main-station) frequencies tends to be event oriented, not unlike the amateurs' event oriented use. Broadcasters have traditionally observed FCC rules and frequency sharing schemes and, indeed, have contributed significantly to those schemes' development. Both groups understand the crucial role they play in supporting communities in an emergency or in disaster relief.

I would suggest that the 420-450 MHz spectrum be made part of a comprehensive sharing arrangement to be devised by a "user" coordinating group (not unlike UTAM for wireless PBX coordination) made up of broadcasters and amateurs. I suggest that the resulting plan be made part of the FCC Rules with the understanding that it tends to preserve the investment and availability of the amateur (and broadcast) resources that presently serve so well the educational and other needs that remain with us in this country at the beginning of the 21<sup>st</sup> century and beyond.

File No. RM-9267

June 1, 1998

Office of the Secretary,  
Federal Communications Commission, Room 222,  
1919 M St. N.W.,  
Washington, D.C.

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JUN - 1 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Dear Mr. Secretary:

I wish to express my objections to the reallocation of any portion of the 70 cm (420-450 MHz) Amateur Radio Band to the Private Mobile Radio Service.

The 70cm Amateur Band is not only a very popular, widely used band, but it is a fundamental resource in support of a basic FCC mandate to amateur radio - that is to provide emergency communication services in a time of local or national need.

This band plays a critical role in the ability of the amateur community to provide emergency, public service, and public interest communications. Using current state-of-the-art 70 cm equipment, amateurs can, and frequently do, establish emergency communications in times of natural disasters such as floods, earthquakes, and ice storms. The equipment is small, lightweight, and extremely portable, thus allowing emergency networks to be established in a matter of hours, or even minutes. Our, already established, nationwide, network of repeaters allows message traffic handling over virtually unlimited distances.

Also, the financial investment by the Amateur community in 70 cm equipment is substantial. I, myself, have over \$500.00 invested. Across the U.S., thousands of 70 cm repeaters have been bought, installed and are maintained by amateur radio clubs and even private individuals. Surely, the total investment must be millions and millions of dollars. This national resource is far too valuable to waste. In addition, the suggestion to allocate 1390 - 1395 and 1427 - 1432 MHz to Amateur Radio use is simply impractical because it fails to recognize that converting existing 70 cm equipment to these frequencies is not feasible.

I strongly urge you to reject the Land Mobile Communications Council request insofar as it impacts Amateur Radio frequency assignments.

Sincerely Yours,



A. A. Moffat (N3KFZ)  
1817 Hopefield Road,  
Silver Spring, MD 20905-4219

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INTELLIGENT TRANSPORTATION SOCIETY OF AMERICA

400 Virginia Ave., S.W., Suite 800  
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(202) 484-4847 □ Fax (202) 484-3483  
<http://www.itsa.org>

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JUN - 1 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
Room 222  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: Petition For Rulemaking of the Land Mobile Communications Council ("LMCC") for an Allocation of Spectrum for the Private Mobile Radio Services (RM-9267)

Dear Ms. Salas:

The Intelligent Transportation Society of America ("ITS America") hereby supports FCC consideration of the above-captioned Petition For Rulemaking submitted by the Land Mobile Communications Council ("LMCC"). In its Petition, LMCC requests the allocation over the next decade of additional spectrum for private mobile radio services ("PMRS").

ITS America is a non-profit, educational association dedicated to the development and deployment of intelligent transportation systems consistent with the national priority established by Congress in the Intermodal Surface Transportation Efficiency Act of 1991 (ISTEA). ITS America's membership is comprised of both public and private sector interests involved in the development and deployment of ITS systems and user services. ITS America also serves as a Utilized Federal Advisory Committee to the U.S. Department of Transportation under the Federal Advisory Committee Act. The comments expressed herein reflect the views of ITS America and do not necessarily reflect the views or position of each of the individual members of ITS America.

In its Petition, LMCC has identified significant concerns regarding the adequacy of existing PMRS spectrum allocations to accommodate the reasonably anticipated needs of the PMRS wireless community. In particular, LMCC has demonstrated the compelling need for PMRS spectrum to accommodate emerging applications, including vehicle location and tracking, telemetry devices, image transmission and LAN, intranet and inetnet interfaces.

The ITS National Program Plan developed jointly by the public and private sector calls for the deployment of thirty one ITS user services in response to the national mandate established by Congress in the Intermodal Surface Transportation Efficiency Act of 1991. These services include, among them, travel and transportation management systems (including en-route driver information, traveler service information, emissions testing and mitigation and incident management), commercial vehicle operations such as weigh-in-motion, electronic clearance and

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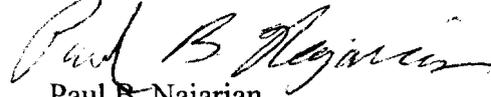
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on-board safety monitoring), emergency management systems and advanced vehicle control and safety systems. Many, if not most, of the ITS user services are dependent upon access to adequate and suitable spectrum for their communications links and for the information (particularly location-based services) that may be generated therewith.

Although many ITS services may be classified as public safety services, ITS America believes that non-public safety PMRS systems will comprise an important element in the national ITS infrastructure and that these systems must be capable of deploying the advanced broadband services described in LMCC's Petition. Accordingly, ITS America urges the FCC to implement rulemaking proceedings looking toward the allocation of additional PMRS spectrum over the next decade to accommodate the growth of existing PMRS systems and the implementation of emerging technologies in those systems.

If there are any questions on this matter, please contact this office.

Sincerely,

A handwritten signature in cursive script, appearing to read "Paul B. Najarian".

Paul B. Najarian

Senior Telecommunications Engineer