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FCC

5-26-98

SECRETARY

WASHINGTON, DC 20554

SUBJECT: FCC RULE 9267

DEAR SIR

AS AN AMATEUR RADIO OPERATOR, I AM OPPOSED TO THE LMCC TAKING ANY OF OUR ALLICATED AMATEUR RADIO FREQUENCIES IN THE 420-430 AND 440-450 MEGAHERTZ BAND.

THESE FREQUENCIES ARE HEAVELY USED FOR EMERGENCY AND ROUTINE TRAFFIC. IT WOULD BE A BLOW TO AMATEUR RADIO TO HAVE ANY OF THESE FREQUENCIES REALLOCATED.

PLEASE TAKE A STAND AGAINST PROPOSED RULE 9267.

THANK YOU VERY MUCH.

Spencer Smith, N6IWX

SPENCER SMITH
2249 E. KNOWHAVEN ST.
SIMI VALLEY, CA 93065

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Adelphia Cable 12
St. Lucie West 21

(407) 692-0056
FAX (407) 692-0908

WTCN-LP
P.O. BOX 1574
JENSEN BCH. FL 34957

May 27, 1998

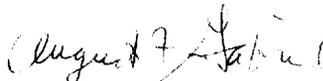
RE: RM-9260

FEDERAL COMMUNICATIONS COMMISSION
1919 M STREET, N.W.
WASHINGTON, D.C. 20554

RE: RM-9260
COMMUNITY BROADCASTING ASSC.
1600 ASPEN LANE
ST. CLOUD, MN 56303

WE SUPPORT RM-9260 for "Class A SERVICE AND HIGHER POWER". WTCN-LP, Stuart, Florida has been on the air since 1991 providing local programming to the area. Also, the commission should give LPTV "Must Carry" status to help cable carriage.

Respectfully,


Stuart Tower Corp.
August F. Gabriel, pres.
WTCN-LP

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Jack E. Giehl, WB8BFS
2780 Fields Ertel Road
Loveland, Ohio 45140

DOCKET FILE COPY ORIGINAL

May 27, 1998

FEDERAL COMMUNICATIONS COMMISSION

Attn: Secretary
Room 222
1919 M Street, NW
Washington, D.C. 20554

Re: **OBJECTION TO REALLOCATION OF PRIMARY 70-CM STATUS TO PMRS**
In the Matter of the LMCC's proposal to REALLOCATE THE 70-CM BAND TO PMRS
RM-9267 Titled, "Opposition to the LMCC's Request to Reallocate Primary Status of 70-cm
to the Private Mobile Radio Service"

Dear Sir:

I am writing this letter to express my opposition to the Land Mobile Communications Council's (LMCC) request that primary user status of the 70-cm band be reallocated from the federal government to the Private Mobile Radio Service (PMRS). As an amateur radio operator of a coordinated Ohio 70-cm band repeater on 443.8 MHz output and 448.8 MHz input, sharing with PMRS or reallocating this frequency pair will cause severe interference with other amateur 70-cm services and, very possibly, eliminate the two frequencies used for the repeater. Emergency messages have been sent through this repeater in the past, and this type of community should not be relinquished to serve commercial interests. I do not feel that amateur radio operators should share the frequencies described in the LMCC's request, RM-9267, with the PMRS. Therefore, I would encourage the LMCC to seek other alternative frequency ranges.

Thank you,



Jack E. Giehl
WB8BFS

/jeg

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EUGENE R. P. LEMAN
23390 Deerfield RD
LOS GATOS CA.95033
Tel.408 353 1013
Fax.408 353 5134
WAJZN

TO
RM 9267
Secretary
Federal Communications Commission
1919 M Street
Washington, DC 205554

Hello

The Loma Prieta Amateur Radio Club operates the AB6VS
repeater on 440 550 Mhz at a location in the Santa Cruz
mountains CA.

Over the years we have had our share of forest fires,
earthquakes and floods not to mention medical emergencies and
car crashes.

The repeater is used by over 60 users, if RM 9267 is
approved, it would have a major negative impact on our
community.

73's

Eugene Leman
WA6JZN
President



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

REGARDING RM 9267

Dear Secretary:

The Land Mobile Communications Council has asked that the 420-430 MHz and the 440-450 Mhz frequency bands be immediately reallocated to the Private Mobile Radio Service. I want to express my opposition to this request.

These frequencies are currently allocated , on a primary basis, to the Amateur Radio Services, And are heavily used by the radio amateurs for experimental, public service and general communication Purposes. They are also widely used in the world wide digital packet networks. Here in Eastern Oklahoma these frequencies are crucial for repeater links used by the Tulsa weather bureau, along with the Amateur Radio emergency services during tornado, flood and other civil emergencies. Without these frequencies these emergency services, along with the damage assessment teams and our local Emergency Services will be severely damaged.

I realize that the commercial demands for the radio spectrum are great, but the present use of these frequencies are important not only in our area, but nation wide.. and should be retained for public use thru the Amateur Radio Services.

Thank you for your time and consideration.

M. V. Marsh
M. V. Marsh N5YTL
6282 East Latimer Place
Tulsa, Ok.

Sincerely

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

REGARDING RM 9267

Dear Secretary:

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I realize that the commercial demands for the radio spectrum are great, but the present use of these frequencies are important not only in our area, but nation wide, and should be retained for public use through the Amateur Radio Services.

Thank you for your time and consideration.



Dudley L. Page N5ROX
1704 Evans
Tahlequah, Okla

Sincerely

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27 May 1998

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

Dear Sir:

Reference Petition for Rulemaking RM-9267, filed by the Land Mobile Communications Council.

I am writing to voice my opposition to above referenced petition.

I have been an amateur radio operator for a little over a year and have a Tech Plus license, call sign KC8GYX. I am also Junior Trustee of the Miami Valley FM Association of Amateur Radio Operators Inc. (MVFMA).

Reallocation of primary status on the 440-450 band segments to the Private Mobile Radio Service (PMRS) would definitely have an adverse affect on the amateur radio community.

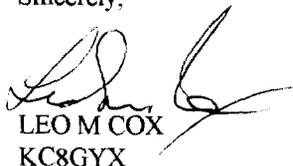
LMCC makes the claim, without evidence or justification, that Amateur Radio could operate on a secondary basis with PMRS stations. What a joke!

I believe that this would totally disrupt Amateur Radio Services emergency communication capability. Keep in mind the fact that the equipment, the repeaters, the packet network, are all paid for by individuals and clubs that do not operate for profit, but operate for public service. They give freely of their time and use equipment that did not cost the public one red cent. In fact it is against our creed to accept payment or remuneration of any kind for our service.

Does anyone really believe that the users of PMRS would relinquish usage of these frequencies during any emergency? If you know of any one who does, I'd like to meet them and maybe we could make a deal on a nice bridge.

I request that RM-9227 be denied.

Sincerely,


LEO M COX
KC8GYX

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May 30, 1998

Federal Communications Commission

1919 M Street N. W.

Washington D.C. 20554

Dear Secretary:

Writing as one of the nation's more than 650,000 licensed radio amateurs, I urge you to disregard RM 9276 proposal. Regarding the 70 centimeter frequencies band.

These amateur radio frequencies are used by radio amateurs all over this nation to provide emergency communication, technical experimentation and recreation.

Thank You

Garold E. Meyer

KB0BOH

15003 27 Road

Fowler, KS. 67844

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Auxiliary Communications Support Officer

22388 Ortega Drive
Salinas, CA 93908-1114

Phone Pager: 785-3097
Home Phone (408) 484-0147
Email chiefdoc@juno.com

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May 29, 1998

Federal Communications Commission
1919 M Street N.W.
Washington, D.C. 20554

AMATEUR RADIO INPUT REGARDING RM 9267

Dear Secretary,

My name is Bob Spencer. I have been an Amateur Radio Operator since 1983. I live in Monterey County and currently I am involved in emergency, public service, communications as my county's Auxiliary Communications Support Officer. During our "El Nino Flood 98" Disaster Event," this past February, I served as the county's Office of Emergency Services (OES) "Emergency Operations Center (EOC) Amateur Radio Representative Supervisor."

Several times our 2 meter (144 - 148 MHz) repeaters were inoperable due to power outages. At one point we were without 2 meter communications for more than 12 hours. Our only other back-up communications band was located on the 440 (70 cm) Amateur Radio band. Without this secondary, back-up band, we in Monterey County would not have been able to communicate with American Red Cross Chapter's, Red Cross Shelters or to receive field reports of emergency situations to be relayed to "911". Many Amateur Radio mobile units were also calling to the EOC requesting road closure and river level reports.

When the 2 meter band was unavailable for Command and Control and Tactical usage, the 440 band "saved our bacon." I realize it is a popular band and I, personally, own 2 very expensive dual band (2 meters and 440) radios. At home I utilize my "base station" as an integral part of my digital, Packet, radio system which links me to the Office of Emergency Services and several other public service "base" Packet stations. Also, within California, there is a "Western Amateur Linking Association" connecting 2 meter, 220 & 440 band links that are useful for hobby and emergency communication usage. This "linking" exists from Ukiah to San Diego in the South and over to Lake Tahoe, Stockton, Coalinga and Visalia in the East.

Thank you for your informed consideration of this RM 9267 issue.

Very Respectfully Submitted,



Bob Spencer

P.S. Elected officials. Please place your support behind the Amateur Radio Community to maintain our "privileges" on these 440 (70 cm. radio bands.

cc: Bob Spencer's file
Congressman Sam Farr
Senator Diane Feinstein
Senator Barbara Boxer

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4526 San Taela Crt.
Woodland Hills, Ca. 91364

REF: RM-9267

North Valley Repeater

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JUN 2 1998

FCC MAIL ROOM

May 26, 1998

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

Dear Sir or Madam:

I am an Amateur Radio operator that uses repeaters in the frequency range between 440 and 450 Mhz. Our group and many others use these frequencies for public service events including the City of Hope walks and aiding local police in traffic control of events. Our repeater was used in the days after the earthquake to locate and pass messages from Orange County and Venture County to the Los Angeles area. Many people depended on us and were grateful that we could help them.

I am opposed to RM-9267. We would not be able to co-exist with land mobile services. They will say that we interfere with them and being the secondary user, we will lose our uses of these frequencies.

Sincerely,



James O'Donnell
N6OYF

North Valley Repeater Group

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DET

DOCKET FILE COPY ORIGINAL

4526 San Taela Cr.
Woodland Hills, Ca. 91364

REF: RM-9267

North Valley Repeater

RECEIVED

May 26, 1998

JUN 2 1998

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

FCC MAIL ROOM

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I am opposed to RM-9267. We would not be able to co-exist with land mobile services. They will say that we interfere with them and being the secondary user, we will lose our uses of these frequencies.

Sincerely,



Kenneth J. Sharpe
N6AWA

..North Valley Repeater Group

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

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JUN 2 1998

May 27, 1998

FCC MAIL ROOM

Dear Commission,

I am an amateur radio operator. My call sign is KQ6PV and I am writing in concern of RM 9267, the proposed rule in the making for the land mobile service.

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

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

The land mobile service has not offered any plan for how they would share the band with us. The current system with the US government has worked well and both parties have had reasonable compromise.

Here in California, amateur radio has quite a following. The public service aspect of our hobby has served many local communities. Just last week, our hospital had a telephone problem and Amateur radio came to the rescue, providing emergency communications at key points in the hospital. During this operation, multiple bands were being used, including the 440 MHz band!

Perhaps most important to my family is the fact that five of my immediate family members, including my wife(KE6URL), and four more in our extended family have amateur radio licenses. With amateur radio, we are closer now than before. In the process, we are learning more about radio operations while communicating. We meet at least daily on many 440 MHz frequencies.

I hope that you will consider my input while RM 9267 is discussed.

Thank you kindly for your time.

William C F Au

William C.F. Au, KQ6PV
 4532 Danita Lane
 Yorba Linda, Ca. 92668

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Federal Communication Commission
Secretary, Room 222
1919 M. Street, N.W.
Washington, D.C. 20554

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Re: **RM - 9267**

Dear Commission:

As a licensed Amateur Radio Operator, I would like to go on record as being strongly opposed to the petition under consideration, RM-9267.

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

One of the five reasons that our Government created the Amateur Radio Service was to have a readily available pool of trained operators to assist with emergency communications when the unexpected occurs. While Amateur Radio is allocated as the secondary user of these frequencies, our emergency networks have caused little interference to the primary user, the United States Government. RM-9267 contains no technical solutions that prove Amateur Radio operators could continue to use these bands for emergency preparations and operations if land mobile communications became the primary user. In Southern California, this relatively small portion of Spectrum will quickly fill up with bases, mobiles, and repeaters assigned to businesses, leaving amateurs and their established emergency communication networks ineffective with the inevitable increase in business traffic under RM-9267.

Please consider fully the consequences of RM-9267 and assigning primary frequency usage to Land Mobile Radio. As a member of the Amateur Radio Community, I want to continue to serve my National, State, and Local Governments by providing my equipment and services during an emergency. RM-9267 will limit the amateur radio operator's access to these frequencies and will definitely interfere with all amateur disaster preparation communication efforts.

Sincerely,

Randy Hawk
(KE6OKY)

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Town: Hurst, Texas
May 18, 1998

DOCKET FILE COPY ORIGINAL Ref: RM 9267

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Secretary, FCC
Washington, DC 20554

JUN 2 1998

Dear Sir,

FCC MAIL ROOM

As I look at the vast "Radio Spectrum" I only see very small dots designated for Amateur Radio use. Surely, this minimal group of frequencies cannot mean that much to any organization other than the public citizens of America. Amateur Radio has been the largest group of volunteers to pioneer the use of this radio spectrum, not only in technical development, but also in training a "ready group" of semi-professional operators.

The (450mhz) 70cm band of Amateur Radio is the second most popular band of frequencies, saturated with simplex and repeater connections, linking the Gulf Coast of Texas to/thru Austin to the Dallas/Fort Worth Metroplex and on to West Texas. Any tampering with the allocations of these frequencies will certainly jeopardize the Public Service that can and has been rendered in time of Gulf Coast Hurricanes and local 'weather watches' in conjunction with the National Weather Service for the Tornado Warning System.

Any one replacing the use of these frequencies must be responsible for a complete reimbursement to each Amateur Radio Operator for his/her replacement of equipment for other frequencies, and assume the responsibility to organize a complete Weather Warning System as it is now organized by Amateur Radio.

I would like to go on record as being bitterly opposed to any tampering with these frequencies now and any time in the future.

Name: DESSA M. KING
Call: KA5ET1
Address: 716 PINE ST
Town, State, and zip HURST, TX 76053

I am a member of the Hurst Amateur Radio Club, who operates the Radio Amateur Civil Emergency Service in conjunction with the City of Hurst and Tarrant County.

Signed: Deessa M. King

c: Senator Kay Bailey Hutchison, Congresswoman Kay Granger,
284 Russell Sen. Off. Bldg. 100 E. 15th St. Suite 500
Washington, DC 20510-4304 Ft. Worth, TX 761002

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JUN 2 1998

FCC MAIL ROOM

24461 Claibourne Rd
Marysville Ohio 43040
May 25 1998

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

RE: RM-9267 Petition for rulemaking by the Landmobile communication council (LMCC).

To: FCC Rulemaking board.

The Amateur Radio Bands are being threatened by commercial interests. The current petition filed April 22, 1998 by the Landmobile Communications Council (LMCC) is asking to have 2/3's of the 420-450 MHz band (70cm) reallocated to the private mobile radio service. The 70cm band is an important and vital band frequencies for amateurs. The importance is in the use for emergencies, public service and public interest communications.

The LMCC proposal is incompatible with continued amateur use of the band. The band is being used by amateurs for community activities, and emergencies. Reduction or elimination of the band from amateur radio will crowd other amateur frequencies. Another consideration is the amount of equipment that will be rendered useless to the amateur community. This is equipment that has been purchased by amateurs in pursuit of a hobby that has no financial return. The hobby of amateur radio is rewarding in the learning of electronics and providing a communications service to the community. Amateur Radio is furthering the Radio Art and expanding the existing reserve within the amateur radio service of trained operators, and technicians and electronics experts.

The amateur radio bands are being used including the 420-430/440-450. It would be a disgrace to remove the frequencies from a currently active service. The proposal for rule making by the LMCC is not acceptable. Please reject this proposal RM-9267.

Sincerely,

John Eugene Moore

5-26-98

John Eugene Moore
N8YRP Amateur Radio Operator EXTRA CLASS
Phone 937-246-5043 Home evenings
Work 937-642-2891 Days
Pager 888-720-9680

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Tuesday, May 26, 1998

Secretary, FCC
Washington, DC 20554

REF: RM 9267 - OPPOSITION

Sirs:

I am very concerned about RM 9267 and wish to express my *opposition* to its approval.

As a licensed radio amateur since 1956, one trained as an Electrical Engineer (M.S.E.E.) and a long-time educator in the area of Electronics and Computer Science, I am well aware of the value of Amateur Radio as a vehicle to interest young people in technology as a career. The loss of spectrum in the 400 MHz region would be a severe loss to Amateur Radio.

The frequencies under discussion serve as the backbone of many communities' amateur radio based civil defense plans. Those frequencies are used for many repeater links on other VHF and UHF bands that enable wide area reliable communications during times when public infrastructure is disabled by earthquake, fire, storm or other natural disasters.

In many metropolitan areas the loss of the frequencies under question would be a severe blow. In populated areas there are few, if any, additional frequencies available for civil defense use in other VHF and UHF bands.

The reassignment of the frequencies in the 70 centimeter band would be a severe blow to the ability of civil defense organizations to provide needed communications during time of need. I am very much opposed to any reallocation of these frequencies.

Sincerely,



Ian A. Webb, Ph.D.
20621 Canyon View Dr.
Saratoga, CA 95070-5805

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FCC MAIL ROOM

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David Isaak
3870 Davis Rd.
McNeal, AZ 85617-9631

May 25, 1998

Secretary
FCC
Washington, D.C. 20554

Re: RM 9267

Dear Sir/Madam,

I am writing in response to Land Mobile Communications Council demand that the FCC relinquish a major portion of the 70 cm ham band to them. As an active radio amateur who utilizes this band and most other bands in the VHF and HF spectrum, I find this request by the LMCC to be totally unacceptable.

The 70 cm band is used not only for general communications but also for vital emergency and disaster communications. As a member of both the RACES and ARES organizations, I feel losing 70 cm privileges would remove an important part of our ability to provide service in these areas as well.

The amateur community has also invested hundreds of thousands of dollars in radio equipment, repeaters and associated hardware. Losing the 70 cm band would make all of this obsolete and create an unrealistic financial burden for manufacturers and users of 70 cm ham radios.

I am requesting that the FCC deny the LMCC or any other organization the right to use any part of the 420-430 Mhz. and 440-450 Mhz. 70 cm amateur band. I certainly have appreciated the privilege of using this band and do not want to lose it. Thank you for acting on behalf of all amateurs in dealing with this matter in a reasonable fashion.

Sincerely,



David Isaak
N4PDR

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FCC MAIL ROOM

Thursday, May 28, 1998

IAN F SILVER
3810 N CHERRY LN
KANSAS CITY MO 64116-2728

Secretary
Federal Communications Commission
Washington DC 20554

REF: RM-9267

It is my understanding that the Land Mobile Communications Council (LMCC) has filed a petition for rulemaking with the Federal Communications Commission (FCC) to re-allocate 420 to 430 MHz, and 440 to 450 MHz to the Private Mobile Radio Service, allowing Amateur Radio communications on those bands on a secondary and non-interfering basis.

I am a Canadian Amateur Radio operator, living and working in the United States on a work visa. I have been licensed since 1992 by "Industry Canada". I wish to make known my objections to the proposed re-allocation of the aforementioned frequencies for several reasons:

1. Amateur operators already heavily use the spectrum in question. It is my assertion that it should be the burden of the LMCC to prove that they can serve the public good better than the existing, entrenched Amateur Radio Service, which currently occupies the 420 to 450 MHz band. Providing private communications on a fee for service basis does not constitute better public service. It only somewhat serves the interests of those using the service, but is more intended to serve the financial interests of the members of the LMCC.
 - a. Amateur Radio operators serve the public good by providing emergency communications in time of disaster, at no cost to the people they serve. The corporate communication companies can not claim this service to the public.
 - b. Amateur Radio operators always seem to manage to successfully provide communications quickly and efficiently in time of disaster, no matter how bad the situation is. The corporate communication companies, though they can invest substantial manpower and funds to repair a damaged network, can not rebuild quickly enough to serve the immediate public need, and thus the public good.

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JUN 2 1998

FCC MAIL ROOM

Amateur Radio Emergency communications is critical in this area of the world (The U.S. Midwest). Severe weather watches and warnings are common in the Midwest. The National Weather Service works closely with emergency operations groups and weather spotters (many of which are Amateur Radio operators) in our area. The proposed re-allocation of bandwidth will have a negative effect on our local area's ability to respond to hazardous and/or dangerous situations.

2. Re-allocation of the 420 to 430 MHz and 440 to 450 MHz bands places an undeserved hardship on Amateur Radio operators using the band.
 - a. Amateur Radio operators, unlike their commercial counterparts, do not generally have the funds available to allow speedy and painless change to new frequencies. In many cases, Amateur Radio operators have had to work for years to be able to experiment with a band of their choice. Since Amateur Radio operators may not charge for communications services they use and/or provide, they have no way to recoup the financial investment already made in equipment to use a band, should that band be re-allocated.
 - b. Amateur Radio operators and frequency coordinators will be forced to do a substantial amount of work to change frequencies and equipment for existing repeaters, transceivers, and other equipment away from the proposed re-allocation bands. This work would not otherwise be necessary if it were not for the proposed re-allocation.
 - c. Amateur Radio operators have no method for restitution for financial damages from the LMCC should the proposal go through. It is understood that no-one actually "owns" frequencies, but this feels much like government annexation without proper compensation, or perhaps a better term would be "Unreasonable Seizure".
3. Secondary Operation with a non-interference expectation will not work to the benefit of Amateur Radio operators, and may place an extra burden on the FCC.
 - a. Non-interference with the proposed primary users of the band (LMCC) will result in demands placed on the FCC to investigate, and issue "Cease and Desist" orders to existing Amateur Radio operators trying to coexist peacefully with the Commercial radio interests.

I have no doubt that this would effectively eliminate Amateur Radio operations from the 420 to 430 and 440 to 450 MHz bands, giving further impetus for the LMCC to then apply to have Amateur Radio operations

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JUN 2 1998

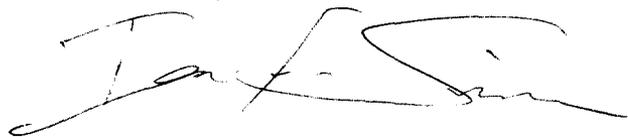
FCC MAIL ROOM

officially removed from those frequencies. The wording of the proposal does not indicate a sincere desire to work with Amateur Radio operators, but rather against them.

- b. High power operations from commercial users would effectively swamp, and possibly damage Amateur Radio operators' equipment in the affected bands. I refer you again to point 2a regarding restricted funds available to Amateur Radio operators.
4. Commercial radio interests have the funds necessary to better use their existing assigned spectrum.
- a. The existing commercial radio interests represented by the LMCC have more funds available to devote to research and development of new methods to better utilize existing spectrum. Amateur Radio operators have extremely limited resources.
 - b. Research and development of new methods to better utilize spectrum allows Commercial interests to better serve the public good by contributing to the technological advancements of the industry, and the national interests of the United States.
 - c. Re-allocation of the 420 to 430 MHz and 440 to 450 MHz bands is only a short-term solution. Commercial radio interests should rather be looking towards long term solutions. Once they run out of bandwidth to attempt annexation of, they'll need to look towards the concept of research, development, and long term solutions anyway.
 - d. Be skeptical of any organization that wants a "quick fix". Quick fixes usually only treat the symptom, not the problem. In my experience, companies that keep utilizing quick fixes, often go quickly bankrupt, leaving a horrible mess in their wake for everyone else to clean up.

I strongly urge you to deny the request in petition RM-9267, and allow the Amateur Radio Service and its operators to continue unhindered in the 420 to 450 MHz frequency range.

Sincerely,



Ian F. Silver (VA3DOA)

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

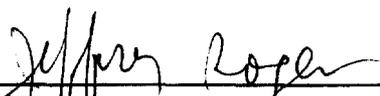
DOCKET FILE COPY ORIGINAL

Dear Secretary:

I am writing to comment on the Land Mobile Communications Council petition RM-9267. My opposition to such a petition is based on many facts, some of which I will relate to you here. I have been a ham radio operator since 1977, been active in ARRL, and also a life member of AMSAT. The service record of such organizations is nothing but stellar, and should continue that way without the problems that will develop from the reallocation of frequencies from 420-430mhz and from 440-450mhz.

This 70cm band is extremely important to me and others who participate in the multiple aspects of amateur radio for public service. As an MD, I am aware of the need for good disaster communications, and as a primary member of the Disaster Committee for Kaiser Permanente of Southern California, I can say that reallocation of these frequencies would be a disaster in its own right. We at Kaiser have over 150 amateur radio stations that participate in bimonthly exercises on these bands as our participation in emergency preparedness for man-made and natural disasters in California.

With our drills, equipment, and network called KPARN (Kaiser Permanente Amateur Radio Network) we have the ability to directly link all of our medical centers in California, both Northern and Southern, and not have to rely on any public services, telephone, or military communications of any kind to keep all of our medical centers in contact with each other, both by voice and by digital communication!



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ns (packet). This system played a vital role in the establishment of communications for the Northridge earthquake of 1994, and continues to be active in drills every other week. We understand that the single thing that will make a disaster preparedness net! work useful is that it is constantly prepared for use, as well as providing information to medical personnel about the safety and security of their own families. When the safety and security of our staff is established, the health-care providers can get on! with the job of providing the necessary disaster relief without emotional inhibition.

Each of us has our own personal communications system based around the bands in question. I personally have a repeater link through our local group, that provides instant access to family and friends for personal and emergency use. Our help is only seconds away, as the repeater is constantly monitored by many of our group members, who have dedicated themselves to providing this service. The use of these bands for the enjoyment of the general public is also found in our activities with the various community projects, such as walkathons, bikethons, 10k runs, and other public events requiring communications for safety and security. As members of the ham radio community participate in these events, they continue with the valuable practice and experience necessary to be proficient in the use of their equipment. Removal of these frequencies from the amateur service, or to allocate them to services that have high interference and low public service value does not appear to be in the best interest of our community.

Regarding public education, there are many projects involving satellite communication, communication with space shuttles and the future communications with the International Space Station. Amateur radio

provides a unique chance for a multitude of students to be exposed to the scientific aspects of communications, and the opportunity for them to become acquainted with our global community. The Boy Scout and Girl Scout programs include amateur radio communications as one of the opportunities to earn badges. But this is not about awards or badges; this is about removing a very well established community service communications system that is dedicated to the promotion of education and provision of safety and security in disaster situations. If we do not prepare; if we do not practice; if we are removed from the bands in question by commercial interests, then we can expect the magnitude of disasters and the emotional impact of such disasters to be unacceptable to a society that prides itself on progress. This is an extensive request for the FCC to reconsider reallocation of these frequencies, with a view to denial of this petition for reallocation of the bands stated above. This view comes from my personal involvement, my professional opinion, and my experience with the disaster preparedness organization for over 20 years. Thank you for your attention. Sincerely,

~~John D. Kovac, MD~~



Scott Communications, Inc.

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MOTOROLA
Authorized Two-Way
Radio Dealer

Del-Val Area Call

Thursday, May 28, 1998

Ms. Magalie Roman Salas
Secretary, FCC
Room 222
1919 M. Street NW
Washington, DC 20554

Subject: LMCC Petition for Rulemaking (RM-9267)

Dear Ms. Salas,

I am writing to express my support for the LMCC's petition to increase spectrum allocation for private wireless users. As a two-way radio dealer in the Philadelphia area, we are acutely aware of, and severely affected by the shortage of clean, available radio spectrum in our marketplace. We are pleased to see that the FCC has reacted so quickly to the LMCC's request, and hope that the request will be acted upon in a timely manner.

As a supplier of radio equipment and service, we have seen many of our customers (and potential customers) frustrated in their attempts to create a wireless communication system that would balance their needs for fast, efficient, cost effective internal communications with amount of radio frequency spectrum available in their required frequency and/or service band. Quite often, a customer has been forced into using a commercial system such as cellular telephones, or Nextel radios, simply because they had no other viable options. These commercial systems often do not provide the group communication ability that many of our customers have relied upon for years to increase productivity and efficiency. The customer is also left to shoulder the burden of a high cost of communication, a cost that is ultimately passed on to the consumer in one form or another.

When it comes to safety and performance, many of our customers simply cannot afford to be subjected to a service availability of less than 99.9% reliability. Many commercial systems do not offer this degree of reliability, and cannot guarantee our customers priority access in cases of emergency. With cellular phones or paging service, the issue of immediate contact is a major concern in life and death situations. Many times the only way to achieve instant communications is through conventional two-way radio, yet customers are stifled by the lack of available channels in their area.

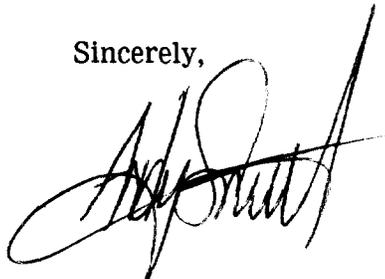
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With more radio spectrum available to conventional private wireless radio users, we can help to eliminate some of these problems, and create customized solutions that our customers demand and deserve. A new allocation of spectrum would allow our business to flourish into the next millennium, and provide custom solutions to an expanding group of customers that need clear, instant, and efficient communications.

Many more people are aware of the benefits of wireless communications today, yet we seem to see more and more of a "one size fits all" approach to communications systems. A new allocation of spectrum would allow increased options for our customers, and increased competition in the marketplace. The people who would benefit the most in the end would be the consumer who receives a better, less expensive product or service from a company that has an efficient communication system.

Once again, thank you for your attention to this timely matter. We hope that the FCC can address these issues quickly as the problems associated with the lack of available spectrum are increasing every business day.

Sincerely,

A handwritten signature in black ink, appearing to read "Andy Smith". The signature is fluid and cursive, with a large, sweeping initial "A" and "S".

Andy Smith

Scott Communications, Inc.