

May 29, 1998

MAY 29 1998

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

Dear Commission:

I am a licensed Amateur Radio operator and I am active on many Amateur Radio frequencies that promote the public welfare through emergency, disaster and public service communications. The 420-430 MHz frequencies are used for linking, control, and Amateur Television. The 440-450 MHz frequencies are used for repeaters which are invaluable in times of emergency. I use them daily to communicate with family and friends. After the Northridge earthquake, I helped coordinate the efforts of volunteer clean-up crews through Amateur Radio.

As a Volunteer with the U.S. Forest Service doing trail work, I use my Amateur Radio equipment and these 420-430 and 440-450 MHz frequencies to supplement the Forest Service communications when I am out on the trails in the Angeles National Forest.

RM-9267 proposes that the Private Mobile Radio Service become the primary user instead of the U.S. government, and that the Amateur service remain the secondary user. The current situation of Amateurs being secondary to the military radar operations on these frequencies has been a successful arrangement for many years. RM-9267 does not give any technical solutions that would allow Amateur Radio to co-exist with the proposed primary use by PMRS. I believe that implementation of RM-9267 would mean that I and Amateur Radio would lose the use of these radio frequencies. Amateur Radio can continue to be a vital communication resource to the public during emergencies and disasters if RM-9267 is not approved.

Sincerely,

*William T. Leslie*

William T. Leslie  
10521 E. Frankmont St.  
El Monte, CA 91731-1511

044

097

May 29, 1998

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

1111 1008

Dear Commission:

I am a licensed Amateur Radio operator and I am active on many Amateur Radio frequencies that promote the public welfare through emergency, disaster and public service communications. The 420-430 MHz frequencies are used for linking, control, and Amateur Television. The 440-450 MHz frequencies are used for repeaters which are invaluable in times of emergency. I use them daily to communicate with family and friends.

I am the Net Control operator for a regular weekly radio club net which helps keep amateurs informed and in contact with each other. When my husband is out on the trails of the Angeles National Forest doing volunteer trail work, I maintain contact with him using the 420-430 and 440-450 MHz frequencies and relay any emergency messages needed.

RM-9267 proposes that the Private Mobile Radio Service become the primary user instead of the U.S. government, and that the Amateur service remain the secondary user. The current situation of Amateurs being secondary to the military radar operations on these frequencies has been a successful arrangement for many years. RM-9267 does not give any technical solutions that would allow Amateur Radio to co-exist with the proposed primary use by PMRS. I believe that implementation of RM-9267 would mean that I and Amateur Radio would lose the use of these radio frequencies. Amateur Radio can continue to be a vital communication resource to the public during emergencies and disasters if RM-9267 is not approved.

Sincerely,

*Jo Ann Leslie*

Jo Ann Leslie

10521 E. Frankmont St.

El Monte, CA 91731-1511

084

08T

RM9267  
Federal Communications Commission  
Secretary, Room 222  
1919 M Street N.W.  
Washington, D.C. 20554

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 Radio 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 communications 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 service during an emergency. RM-9267 will limit the Amateur Radio Operator's access to these frequencies and will definitely interfere with all Amateur Disaster Communication efforts.

Sincerely,

Enc. 4 copies

*Jeffrey F Lempel*

KE6AQC

No. of Copies rec'd 4  
List A B C D E

*OST*

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554  
In the Matter of

**DOCKET FILE COPY ORIGINAL**

An Allocation of Spectrum for  
Private Mobile Radio Services

RM-9267

To: The Secretary,  
Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

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

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

Amateur Radio has and will continue to share its VHF/UHF allocations with mutually compatible services and operations. These have included, the U.S. government, the U.S. military, NOAA Doppler wind shear radar and other government radiolocation services. Amateur Radio has a long and proud history of supporting the U.S. armed forces and NOAA through the National Weather Service's SkyWarn system. For these reasons, there is a mutual interest in sharing between compatible services like Amateur Radio and the U.S. government. However, there are no mutual interests in common with for-profit private land mobile services; "sharing", as in the AVL example, will result in the loss of 420-430 and 440-450 MHz by the Amateur service, which will prove devastating to the mission of the Amateur Radio service.

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

San Bernardino County RACES  
Orange County RACES  
Irvine Disaster Emergency Communication (IDEC)  
Army MARS

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

5

DET

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,

*Charles Bajza*

CHARLES BAJZA, WA6WAK  
9352 MAYRENE DR.  
GARDEN GROVE, CA 92841  
May 25, 1998

DOCKET FILE COPY ORIGINAL

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554  
In the Matter of

An Allocation of Spectrum for  
Private Mobile Radio Services

RM-9267

To: The Secretary,  
Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

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

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

Amateur Radio has and will continue to share its VHF/UHF allocations with mutually compatible services and operations. These have included, the U.S. government, the U.S. military, NOAA Doppler wind shear radar and other government radiolocation services. Amateur Radio has a long and proud history of supporting the U.S. armed forces and NOAA through the National Weather Service's SkyWarn system. For these reasons, there is a mutual interest in sharing between compatible services like Amateur Radio and the U.S. government. However, there are no mutual interests in common with for-profit private land mobile services; "sharing", as in the AVL example, will result in the loss of 420-430 and 440-450 MHz by the Amateur service, which will prove devastating to the mission of the Amateur Radio service.

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

San Bernardino County RACES  
Orange County RACES  
Irvine Disaster Emergency Communication (IDEC)  
Army MARS

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

5  
OET

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,



Christopher Romero, KM6ZZ  
25982 Via Del Rey  
San Juan Capistrano, CA 92675  
May 25, 1998

File No. RM-9267

DOCKET FILE COPY ORIGINAL

3465 Carlson Blvd. 3.  
El Cerrito, Ca. 94530  
May 22, 1998

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

Dear Commissioner:

The Contra Costa Repeater Association (CCRA) is an Amateur Radio repeater group in Northern California. We operate and maintain a radio system that utilizes frequencies between 420-430 MHz. and 440-450 MHz., with a membership of approximately 150 people. This letter will explain how this spectrum is invaluable to our public service and emergency communications role.

For many years now, our group has been affiliated with various organizations in Northern California that provide public service and disaster communications. The Amateur Radio Communications Team provides supplemental communications support. The CCRA is either currently, or has been in the past, an active participant in each of these activities. The Radio Amateur Civil Emergency Service (RACES) is a component of the Sheriff's Office as well, and the CCRA system plays a major role in the Contra Costa County RACES communications plan.

In addition to all this, the CCRA maintains an active dialog with many of the cities, and other counties, in Northern California, making our system available for frequent public service activities, as well as for emergency preparedness. During the 1989 Loma Prieta Earthquake, our repeaters were in use for many days for disaster communications and support. And again in 1990, we were called upon to provide radio communications assistance for the Oakland/Berkeley Hills Fire that claimed many homes and several lives. The CCRA regularly provides communications support for many public service activities and for emergency communications preparedness, thus benefitting members of our communities on a daily basis!

Here in California, we have many mountain ranges that make it very difficult to communicate over broad areas without the use of repeaters. Our system is a network of repeaters that, when linked together, enable us to serve a much larger area than we could without them. The frequencies between 420-450 MHz. allow us to maintain and improve on the communications resources that we can offer the people of our community for public service and emergencies.

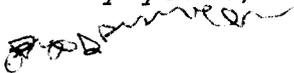
It is absolutely essential that we continue to have practical access to the spectrum between 420-430 MHz. and 440-450 MHz. so that we can provide high quality Amateur Radio communications to

OJS  
OET

Northern California. The story of our organization's usage of this spectrum is not unique. It is repeated by other amateur radio clubs countless times across this country. The Land Mobile Communications Council's (LMCC) assertion that Amateur Radio could remain on a secondary basis is unworkable. With this said, we ask that the Commission not act on the LMCC petition.

We recommend that the Commission maintain the U.S. Government primary allocation in the 420- 450 MHz. band, with Amateur Radio use continuing on a secondary basis.

Sincerely yours,



James R. Gammon  
Member, Contra Costa Repeater Association



# THE AMERICAN RADIO RELAY LEAGUE, INC.

## Leadership Official



- ASST. SECTION MANAGER • SECTION EMERG. COORDINATOR • SECTION TRAFFIC MANAGER • AFFILIATED CLUB COORDINATOR • BULLETIN MANAGER
- EMERGENCY COORDINATOR • DISTRICT EMERG. COORDINATOR • NET MANAGER • OO COORDINATOR • PUBLIC INFORMATION COORDINATOR
- STATE GOVERNMENT LIAISON • TECHNICAL COORDINATOR • ADVISORY COMMITTEE MEMBER • NTS OFFICIAL • QSL BUREAU MANAGER

4940 Trail Street  
 Norco, CA 91760  
 26 May 1998

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

**DOCKET FILE COPY ORIGINAL**

RE: RM-9267

I am writing concerning the Land Mobile Communications Commission Petition For Rulemaking (RM-9267) regarding immediate reallocation of the 420 MHz - 430 MHz and 440 MHz - 450 MHz Radio Frequency Spectrum from Government primary use to Private Mobil Radio Service.

I am very concerned about the prospect of disruption of the Amateur Radio (Ham) operations on the above mentioned frequency bands if RM-9267 is approved. The Amateur Radio 70 Centimeter (cm) Band (420 MHz to 450 MHz) has been used many years for vital public service and emergency operations, in addition to personal Ham Radio, communications. The Ham Radio SKYWARN System, used to alert the public of Tornado and other severe storms, in many regions of the United States utilizes the 70 CM Ham Band. Other uses of the 70 cm Ham Bands include Amateur Television, Earth-Moon-Earth (EME) Communications, Satellite Communications and Radio Repeater operations. In the Southern California area alone, there are over 450 individual Ham Radio Repeaters in the 440 MHz - 450 MHz frequency band that would be affected if the RM-9267 frequency reallocation proposal was implemented.

For many years the Amateur Radio 70 cm Band has been used secondarily to the US Government needs. The Ham Community has been a good partner with the Government. I don't envision the LMCC primary usage of this spectrum would result in the same good partnership relationship with Ham Radio. The nature and intensity of the LMCC planned use would no doubt be incompatible with Ham Radio. In addition, the subject LMCC Petition For Rulemaking does not offer any ideas on how amateur radio can continue to share the bands if their request is granted.

The FCC is respectfully requested to reject the LMCC Proposal For Rulemaking (RM-9267) regarding immediate reallocation of the 420 MHz - 430 MHz and 440 MHz - 450 MHz Radio Frequency Spectrum from Government primary use to Private Mobil Radio Service

Sincerely,

Arthur E. Sutorus, KQ6HF  
 ARRL Orange Section Technical Coordinator

5  
 OET

RECEIVED

NOV 3 1988

DOCKET FILE COPY ORIGINAL

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

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

To: The Secretary,  
 Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

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

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

Amateur Radio has and will continue to share its VHF/UHF allocations with *mutually compatible* services and operations. These have included, the U.S. government, the U.S. military, NOAA doppler wind shear radar and other government radiolocation services. Amateur Radio has a long and proud history of supporting the U.S. armed forces and NOAA through the National Weather Service's SkyWarn system. For these reasons, there is a *mutual interest in sharing between compatible services* like Amateur

024  
 030

Radio and the U.S. government. However, there are *no mutual interests* in common with for-profit private land mobile services; "sharing", as in the AVL example, will result in the loss of 420-430 and 440-450 MHz by the Amateur service, which will prove devastating to the mission of the Amateur Radio service.

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

Los Angeles County Sheriff Disaster Communication Service (DCS)

California Highway Patrol

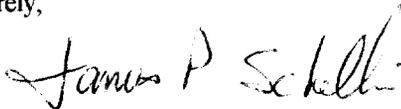
El Monte Police Department

Orange County Fire, etc.

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,



James P. Schellin, K6JPS

8415 Mandarin Ave.

Alta Loma, Ca. 91701

May 21, 1998

DOCKET FILE COPY ORIGINAL

RECEIVED

JUN 2 1998

RECORDS ROOM

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,

*Steven Chan*

KF6LZK

024  
68T

DOCKET FILE COPY ORIGINAL

RECEIVED

JUN 2 1998

FCC MAIL ROOM

To: The Secretary,  
Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

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

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

Amateur Radio has and will continue to share its VHF/UHF allocations with mutually compatible services and operations. These have included, the U.S. government, the U.S. military, NOAA doppler wind shear radar and other government radio location services. Amateur Radio has a long and proud history of supporting the U.S. armed forces and NOAA through the National Weather Service's SkyWarn system. For these reasons, there is a mutual interest in sharing between compatible services like Amateur Radio and the U.S. government. However, there are no mutual interests in common with for-profit private land mobile services; sharing, as in the AVL example, will result in the loss of 420-430 and 440-450 MHz by the Amateur service, which will prove devastating to the mission of the Amateur Radio service.

Many government agencies and non-profit disaster relief organizations would be tremendously harmed by the loss of the

No. of Copies rec'd  
List A B C D E

024

02T

Amateur 420-430 and 440-450 MHz allocations. These frequencies are critical in times of emergencies here in Sonoma County, especially during the flooding of the Russian River. My support of county emergency services will be severely impacted by the loss of these frequencies.

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,

  
James I. Hill, K6UUW  
1212 Larkin Dr.  
Sonoma, CA 95476

May 26, 1998

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554  
In the Matter of

DOCKET FILE COPY ORIGINAL

An Allocation of Spectrum for  
Private Mobile Radio Services

RM-9267

To: The Secretary,  
Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

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

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

Amateur Radio has and will continue to share its VHF/UHF allocations with mutually compatible services and operations. These have included, the U.S. government, the U.S. military, NOAA doppler wind shear radar and other government radiolocation services. Amateur Radio has a long and proud history of supporting the U.S. armed forces and NOAA through the National Weather Service's SkyWarn system. For these reasons, there is a mutual interest in sharing between compatible services like Amateur Radio and the U.S. government. **However, there are no mutual interests in common with for-profit private land mobile services; "sharing", as in the AVL example, will result in the loss of 420-430 and 440-450 MHz by the Amateur service, which will prove devastating to the mission of the Amateur Radio service.**

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

San Bernardino County RACES  
Army MARS  
Red Cross

5  
OCT

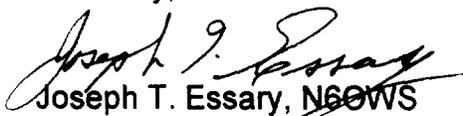
Page Two

To: The Secretary,  
Federal Communications Commission

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,



Joseph T. Essary, N6OWS

P.O. Box 2087

31237 All View Drive

Running Springs, CA 92382

May 28, 1998

Before the  
FEDERAL COMMUNICATIONS COMMISSION

Washington, D. C. 20554

DOCKET FILE COPY ORIGINAL

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

To: The Chief  
Private Wireless Division  
Wireless Telecommunications Bureau

OBJECTION TO  
REALLOCATION OF PRIMARY 70-CM STATUS OF PMRS

I hereby 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, I value the use of the 70-cm band as a secondary user, and feel it should remain this way. As you know, amateur radio operators provide a valuable service to the citizens of this country by providing emergency communications on a voluntary basis, at their own expense. I feel that sharing the frequencies described in the LMCC's request, RM-9267, would hamper the ability of amateur radio operators to perform this service and enjoy the use of this band. Therefore I would encourage the LMCC to seek other alternatives, in other non-amateur frequency ranges.

Dated: May 29, 1998

Thank you,

*Ronald J. Ackerman*

Ronald J. Ackerman, N8KBG  
8120 Hathaway Place  
Bridgman, MI 49106

No. of Copies rec'd  
List A B C D E

024  
087

RECEIVED

JUN 2 1998

FCC MAIL ROOM

Aerospace Employees Association Amateur Radio  
The Aerospace Corporation  
P. O. Box 92957  
Los Angeles, CA 90009-2957

DOCKET FILE COPY ORIGINAL

Response to Petition: **RM-9267**

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

26 May 1998

The amateur radio operators of the Aerospace Employees Association (AEA) Amateur Radio Club wish to express their staunch opposition to the reallocation of frequencies assigned for amateur radio use in the petition for rulemaking submitted by the Land Mobile Communications Council (LMCC) dated April 22, 1998. In RM-9267, the LMCC desires to have 420-430 MHz and 440-450 MHz reassigned to the Private Mobile Radio Services. This spectrum is now within the Amateur Radio Service 70 centimeter band of 420-450 MHz.

These frequencies are currently used quite extensively by amateur radio operators in the greater Los Angeles area. The AEA Amateur Radio Club members utilize these frequencies for many modes of communication, including voice, packet radio, and amateur television. Club members participate in activities in which amateur radio provides a public service, and use frequencies in the 420-450 MHz allocation to perform these services. The club also participates in area disaster communications activities which rely on numerous amateur radio allocations, including 420-450 MHz.

Loss of the large portions of the current Amateur Radio Service allocation suggested in RM-9267 would result in extreme frequency overcrowding which will prevent many communications from being completed successfully. This would especially impact those organizations, including the AEA Amateur Radio Club, involved in disaster communications activities. Many packet radio backbone links also exist on these

No. of Copies rec'd  
List A B C D E

5

OET

frequencies, and their loss would impact amateur radio operators utilizing packet radio on other allocations besides 420-450 MHz, effectively widening the impact beyond this single allocation.

The consolation to this loss of frequencies offered to amateur radio operators by the LMCC of 1390-1395 and 1427-1432 MHz is not a good solution. The equipment required to operate in the 1+ GHz range is more complicated and has different performance characteristics to what is presently used by amateur radio operators on 420-450 MHz. There is also a very large base of equipment owned by amateur radio operators for 420-450 MHz due to the allocations' popularity and high usage.

In conclusion, the AEA Amateur Radio Club urges the FCC to not support the section of RM-9267 which requests the reallocation of 420-430 and 440-450 MHz. We ask that the FCC continue to maintain the 420-450 MHz section of radio spectrum as a secondary allocation to the Amateur Radio Service.

Sincerely,



Michael D. Worshum

AEA Amateur Radio Club President

May 27, 1998

RECEIVED

JUN 2 1998

FCC MAIL ROOM

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

Comment on RM 9267

Dear Mr. Secretary,

I hold an Advanced Amateur Radio license (W7IKT). My wife Carol (N5CBQ) is also licensed. I am writing to let you know my concerns about RM 9267, and the possible loss of 30 MHz of the 440 UHF Amateur Radio Band.

We live in San Angelo in West Texas. This is the season of severe weather, Thunderstorms and Tornado's in West Texas. When severe weather threatens our area the U. S. Weather Bureau calls out the weather net. Last Night the net was called out about 7 p.m. and was active till past midnight. We use the 440 band to link repeaters to get weather information from other areas to the San Angelo Weather Bureau.

There are many activities other than emergencies that take place on the 440 band. To name a few repeaters, satellite communications, Amateur Television, moon bounce, and links between local and wide-area repeater's take place. The band is well used and fully allocated to various activities.

I have a considerable investment in radios which operate on the 440 Band.

The 440 Band is important to ham radio, both for emergencies and weather nets and the enjoyment of ham radio.

Thank you,

Robert C. Heiser Jr.  
8346 Ducote Air Park Road  
San Angelo, Texas 76904-3602

No. of Copies rec'd 5  
List A B C D E OET

RECEIVED

DOCKET FILE COPY ORIGINAL

JUN 2 1998

Charles G. Abbott, Jr./K6KLP  
20465 Shamrock Place  
Chatsworth, Calif. 91311

FCC MAIL ROOM

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

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,

*Charles G. Abbott, Jr.*

No. of Copies rec'd 054  
List A B C D E 02T

RECEIVED

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554  
In the Matter of  
An Allocation of Spectrum for )  
Private Mobile Radio Services )

JUN 2 1998  
DOCKET FILE COPY ORIGINAL

FCC MAIL ROOM

RM-9267

To: The Secretary,  
Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

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

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

Amateur Radio has and will continue to share its VHF/UHF allocations with mutually compatible services and operations. These have included, the U.S. government, the U.S. military, NOAA doppler wind shear radar and other government radiolocation services. Amateur Radio has a long and proud history of supporting the U.S. armed forces and NOAA through the National Weather Service's SkyWarn system. For these reasons, there is a mutual interest in sharing between compatible services like Amateur Radio and the U.S. government. However, there are no mutual interests in common with for-profit private land mobile services; 'sharing', as in the AVL example, will result in the loss of 420-430 and 440-450 MHz by the Amateur service, which will prove devastating to the mission of the Amateur Radio service.

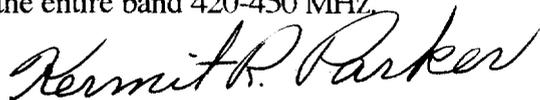
Many government agencies and non-profit disaster relief organizations would be tremendously harmed by the loss of the Amateur 420-430 and 440-450 MHz allocations. The following is a partial list of agencies that I have assisted with providing emergency communications via Amateur Radio using the 420-450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

California Department of Forestry and Fire Prevention, The California Highway Patrol (ATV), California PDepartment of Emergency services and local Police.

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,



Kermit R Parker W6JFN  
15975 Sonoma Hwy.  
Sonoma, CA. 95476-3026

May 27, 1998

□

No. of Copies rec'd  
List A B C D E

015  
0ET

RM9267

DOCKET FILE COPY ORIGINAL

Kenneth C. Myers Sr.  
975 Hilton Dr.  
Reynoldsburg, Ohio  
43068-1332

May 29, 1998

Federal Communications commission  
Washington, D.C. 20554

Dear Sirs:

I have been a Amateur Radio opperator Five [5] years. I have enjoyed the Amateur field for fun and have also for emergies.

I hope that the 70cm band is not taken away from us. The 70cm band 420-430 and the 440-450 MHZ is very use ful to the amateurs. The Amateur Radio service use of these bands are in time of disastor, community serve, to other organizations. They have been in help for accendients to get emergies services to the locations.

Thank you for your attention to this impartment tmatter.

Sincerely,



Kenneth C. Myers Sr.  
N8XYP

5

OST

RM-9267 - Comments to The FCC - May 26, 1998

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

Original Letter

Gentlemen:

DOCKET FILE COPY ORIGINAL

I am opposed the partition from the Land Mobile Communications Council!

I am a licensed amateur radio operator (N1XKB). I have on several occasions participated in major "Ham Radio Public Service Events" ranging from : The Boston Marathon, The Jimmy Fund Walk, The Walk for Hunger, and services for the handicapped. The communications services provided by licensed amateur radio operators for several of these events can encompass as many as two hundred operators over the duration of the event. These individuals donate their time to public service (which is becoming a less prevalent attitude on the part of the American populace. People seem to have adopted an attitude of let the government do it or let someone else pay for it.). Public service and a national conscience was (and hopefully remain) major factors in making this great republic the best that the world has seen.

In order for licensed radio operators to continue to perform significant public service functions effectively, we need the available bandwidth that we presently have. A typical major event will use three or four repeaters ( one each for "Marshals", "Busses", "Medical" and "Set/Up & Breakdown Logistics". These are typically established on the 2-Meter Band because of the greater availability of privately owned radio equipment. This results in the major repeaters for the area being occupied and being restricted from "normal amateur use". Much of normal amateur use is also "public service" in nature, providing message traffic, highway assistance, etc. However, "Net Controls", any linking of repeaters, and displaced normal amateur use depend on communications in the 420-450 MHz band.

It is my understanding that these frequencies were previously allocated to "amateur radio service" and that the military then needed them for radar operations during the cold war era. Nobody would dispute the use of these frequencies for the protection of the nation. If this need no longer exists, then the frequencies should revert back to public service. Several of the member organizations of the LMCC may be able to lay some claim to public service. They should however, be more specific as to where their public service contributions can be accommodated without infringing on amateur radio public service functions.

Amateur radio also supports emergency communications through the "Radio Amateur Civil Emergency Service" (RACES) and the "Amateur Radio Emergency Service" (ARES) organizations of amateur radio operators. These organizations consist of trained, licensed amateur radio operators who depend on the availability of the 420-450 MHz band. There may be a vested interested feeling among some "public service personnel" that their newer equipment can cover the services provided by RACES and ARES, but they are depending upon commercial services and this remains to be proved. Notwithstanding, whether they pass their first few instances, amateur radio operators offer a widely distributed privately-owned-and-operated network of emergency power and communications equipment which is available for emergency service.

I do not have the time, particularly in light of the late submittal by the LMCC, to offer a personal technical critique of their proposal. I am however a member of the American Radio Relay League "ARRL" (Member #1797688). The ARRL is the premier voice of licensed amateur radio operators and has the resources to respond in a timely manner. I support the submittal that is/will be sent to you regarding this matter by the ARRL.

Very truly yours,  
Roger B. Cooper (N1XKB)  
52 Bay State Road  
Wakefield, MA 01880-1047  
( N1XKB@amsat.org )

*Roger B. Cooper*

5  
OCT