

Arthur Towslee WA8RMC
180 Fairdale Ave
Westerville, Ohio 43081
614-891-9273

DOCKET FILE COPY ORIGINAL

RECEIVED

JUN 2 1998

May 27, 1998

FCC proposal RM-926
Secretary, Federal Communications Commission
1919 M St NW
Washington, DC 20554

Dear Secretary:

Our Amateur Television Club and I are frequent users of the 420 to 450 MHz portion of the amateur radio allocation for the transmission and reception of amateur television signals. We are stunned by the request of the LMCC's proposal to eliminate our operation in this band. I feel that it is irresponsible for them to take such action but in any case I'd like to point out what I feel are four valid reasons why the request should be denied.

First, I understand that they wish to become the primary authority in this band and express their desire to "share" the band on that basis. However, we presently share this band with the military where they are primary and works very well because they have not taken up permanent residence. However, if the LMCC establishes a station on a given frequency it would remain there on a permanent basis where sharing is not possible. Therefore, even though sharing is stated, I'm sure that it is not their intent.

Second, since the 420-430 MHz portion is presently allocated for amateur television repeater service, if that is taken away there is nowhere else to go in this band. The 430-440 MHz segment would be the only space left. We presently have invested over \$10,000 in our repeater which represents the investments of many individual donations to get where we are today. This may seem rather small at the corporate level but individually it represents quite an investment. Please don't allow this and many other club's investments go down the drain needlessly.

Third, because of our repeater capabilities, we are able to serve the community with surveillance video for public service activities. For instance, each year the Columbus, Ohio police department enlists us to provide crowd control surveillance video for the July Fourth fireworks show where a crowd of over 500,000 isn't easy for the police without our help. We receive an award each year for our efforts. This activity and numerous others are provided by amateurs at NO COST to the public or Government which financially is a great bargain.

Fourth, we assist the local severe weather spotters with visual weather activity, including the retransmission of Government radar, to supplement the spotting activity and give the public additional advance notice of impending inclement weather. As Government personnel are staffing down to meet cost objectives, we are staffing up to meet the public demand for better service. The TV stations are even keeping a close watch on our activity because it assists them in keeping the public informed. Again, I point out, this costs the Government nothing for the valuable service we provide.

All of the activities above will be lost if the LMCC is granted their request. Therefore, I strongly urge you to carefully scrutinize the request and weigh the facts. If so, I believe you will have come to the conclusion that the existing amateur activity on this valuable frequency is far more important than the proposal by the LMCC.

Thank you for your consideration.

Sincerely,


Arthur Towslee WA8RMC
President
ATCO (Amateur Television in Central Ohio, Inc)

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List A B C D E

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FROM:

5-21-88 DOCKET FILE COPY ORIGINAL

Charles N. Fisher, JR N3LWQ
6315 Marchand St., Apt 3
Pittsburgh, Pa. 15206

Charles N. Fisher, JR

2 1998

To: Federal Communications Commission
Office of the Secretary
Room 222
1919 M St. NW
Washington DC 20554

RE: RMP 9267

Gentlemen:

As an amateur operator specializing in VHF & UHF emergency radio activity, I am concerned that re-allocation of the 70 centimeter amateur band will harm our ability to operate for the public good as follows:

A. Crossband repeat. Example, Pitcairns, Pa. flood emergency, July 1997. Eight Red Cross damage assessment teams operating on steep, narrow terrain over a four-day period had difficulty communicating with base station (myself). Two operators with HT/mobile crossband, however were 100% effective.

B. Two meter repeater emergency links. Our district ARES (9 southwest Pa. counties serving over 1,000,000 people) is ^{now} attempting a 70 cm. link to repeaters in each county. We are concerned for the future. 305

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JUN 2 1998

FEDERAL BUREAU OF INVESTIGATION

Dear Sirs:

In reference to your rm 9267, filed on behalf of the Imcc. As an amateur radio operator (wb5man), I wish to strongly oppose the heavy-handed actions of the Imcc. As a large group of moneyed agencies, and businesses and a few governmental groups, they have not come to you asking for some additional frequencies that might be available. Instead they have come demanding that the amateur community, which doesn't have the funds to mount a financial battle, just to give in and except the outcome. The 70cm band is an integral part of every day activity. My radio club has its repeater on 442.750, and is in use daily. In addition many linking systems depend on the 70cm band. Packet backbones are also involved there. As you know many a disaster has had its amateur radio operators involved with their mobile rigs and handie talkies, a large number of them on the 70cm band. The popular 2meter band has become increasingly congested with the advent of the no code tech license, and QRM is becoming a real problem I would not like to imagine the results, if those on 70cm were forced to move to the 2m band as well. In addition the amateur radio operators, while going above and beyond in their service to the community in many aspects, have borne the brunt of the expense of their equipment out of their pockets. No corporate deep pockets here. Please help keep the amateur volunteer, able to continue his activities.

So in conclusion, I again call upon you to reject rm9267. Please don't let the bottom line always be the bottom line. Leave to the little groups their share of the American spectrum.

Thanks for you time and consideration.

Edward Allen Golden

WB5MAN/AAT6JT

No. of Copies rec'd 10
List A B C D E OET

William D. Vehe
927 S. Sixth Ave
La Grange, Illinois 60525

RECEIVED
JUN 2 1998
FCC MAIL ROOM

Secretary
FCC
Washington DC 20054

Dear Sir or Madame:

The purpose of my letter is to state my opposition to RM9267

This proposal, if adopted, will cause a large negative impact in the ability of the amateur radio community to serve the public in times of emergencies. Basically this proposal will force the amateur service to use the crowded lower VHF bands and HF bands in times of emergencies.

However, in situations where the emergency communications need is limited to localized areas, the VHF and UHF frequencies are particularly well suited because they do not have the inherent limitations unique to the HF bands. Therefore, if RM 9267 is adopted and the amateur radio community loses access to the 450MHz band, the result is likely to limit their ability to provide communications particularly in times of public need.

As for alternatives, the amateur community will be forced to utilize the HF bands if necessary to cover even local emergencies. However, in my own experience, HF is ineffective when used to cover a local emergency.

In 1955, I participated in a civil defense exercise which included the whole state of Illinois. Our station was located in the Museum of Science and Industry. The purpose was to handle simulated emergency traffic for the seven so called "Target Cities" of Illinois. Under the Radio Amateur Civil Emergency Service, (RACES) we were assigned to operate on 3997 KiloHertz as the net control station. That morning, a large thunderstorm passed through the area. With lightning strikes nearby it was impossible for the net control station to establish any meaningful communications during the whole day of the exercise with any target city station.

The Illinois State Police had also set up a low band FM station in the museum a few hundred feet from our amateur station. They were quite successful with their modest setup.

In conclusion, there is no doubt in my mind that if RM9267 is adopted, the ability of the amateur radio service to provide emergency communications will be impacted.

Sincerely,

William D. Vehe

William D. Vehe W9ZJ

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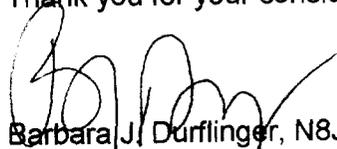
28 May 1998

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

Regarding the matter of the LMCC's proposal to reallocate the 70cm band to PMRS, I am opposed to such reallocation. This band has been used on a secondary basis by the Amateur Radio Community for years for public service, disaster communications support, experimentation and interlinking of other disaster communications frequencies. To allow commercial use of these frequencies would render useless the Amateur Radio Operator ability to assist with communications during times of crisis.

I encourage the LMCC to seek other, more compatible alternatives in other frequency ranges.

Thank you for your consideration.


Barbara J. Durlinger, N8JML
1258 Miami Rd
Benton Harbor, MI 49022
616-982-0404

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Wayne Heinen N0POH JUN 2 1998
4131 S, Andes Way
Aurora, CO 80013-3831 FCC MAIL ROOM

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

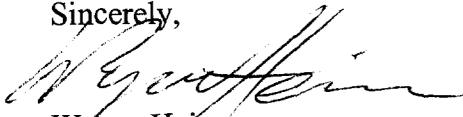
I am vehemently opposed to RM9267. Here in the Denver Metropolitan Area the band of 420 MHz through 440 MHz is actively being use to provide vital auto-patch links on one of the Aurora Repeater Association's repeater (448.85 MHz). This repeater allows access to all local police departments. I use this an average of twice a week to report traffic problems and suspected drunk drivers to our local authorities.

In the past year I have personally used both simplex and repeated operation while handling traffic for two local Bicycling Charity events that raised money for local charities.

This band is of considerable value to the amateur community for providing those types of service expected of us. I feel that the loss of this portion of the spectrum that would be incurred under RM9267. As I have read the proposal, there appears to be no firm plan for the "shared" access that this proposal represents.

It is my hope that the Federal Communications Commission will not approve this proposal.

Sincerely,



Wayne Heinen

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RAYMOND A. SIPOSS

JUN 2 1998

1718 Crystal Ridge Way, Vista, California 92083-5454
(760) 727-8388 • Fax (760) 727-8388 • Vmail Pager (714) 266-8358 • Internet: Alphavid@fda.net

FCC MAIL ROOM

May 27, 1998

DOCKET FILE COPY ORIGINAL

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

Ref: RM 9267

Dear Commissioners:

I am writing in regards to RM 9267 and the shock that such a request has been made by the Land Mobile Communications Council in the first place.

Having been active in the communications industry as well as being a licensed ham radio operator for many years, I would ask that you discard the request made by the LMCC for the spectrum they requested in the 70 cm band. Their sole interest is to take a public natural resource and reallocate it to the Private Mobile Radio Service.

I am a part of the Land Mobile industry and am terribly offended that the LMCC would make the request they did. Numerous colleagues of mine that feel the same way. The LMR industry has many hams that are in the business because they enjoy communications technology and experimentation. Evidence of this is apparent when one travels to trade shows such as the recent Wireless show in Las Vegas.

This motion (RM 9267) that the LMCC put forth before the FCC for consideration is NOT shared by most in the industry. One can only wonder and question the motivation for it.

This spectrum is the second most active band for use by hams.

In my own personal experience, I am part of a networked radio system that links 3 states and one foreign country together using the 70cm band. We use the 420-440 spectrum to link the various mountain top sites together, and the 440-450 spectrum to transmit to the mobiles and portable radios.

Over the years we have handled countless mobile emergencies using this band, and continue providing public service on an almost daily basis using radios in this spectrum.

A few years ago a large portion of the the 220 mhz ham band was reallocated primarily to United Parcel Service. They made the demand for its use, had the money for the lobbying effort, and won the prize. In the end, they decided not to use what they won, and in the process ruined the use of what was a popular band in the Southern California area. Unlike just a few years ago, there are currently no manufacturers making a dedicated 220 mhz mobile radio for ham use, and the remaining users are struggling to keep that band alive.

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Ham radio operators are very volunteer and community service minded. They enjoy sharing their hobby with others and find it rewarding when they can provide help in major emergencies.

JUN 2 1998

any further erosion of these popular ham bands continues, you will have helped in destroying a true national resource that can't be bought at any price... people willing to help people for FREE.

CC MAIL ROOM

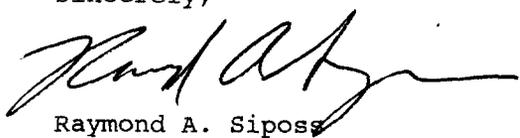
This band is also popular because in many communities the homeowner associations restrict antenna size. This band uses a small antenna that can circumvent those CC&R restrictions.

If the FCC would like to do something constructive, then perhaps looking at setting up a Spectrum Preserve similar to a National Forest so that the commercial interests that want to steal the spectrum for financial rewards will be stopped before it is too late. We all realize that once these frequencies are taken, they will be gone forever and there will be no replacement for them.

We know that the future will generate some new technologies with digital compression, spread spectrum, and other unknown ideas yet to be seen. Until that time, we have a limited resource that needs to be treated as such. We need to learn from past lessons on handling precious resources and not give in to all the money and commercial interests at whatever costs.

I urge you to vote NO on RM 9267.

Sincerely,



Raymond A. Siposs
WB6LST

DOCKET FILE COPY ORIGINAL

May 25, 1998

Stanley R. Reid, Jr.
610 Cloverleaf Dr.
Monrovia, CA 91016

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

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JUN 2 1998

FCC MAIL ROOM

To whom it may concern:

I just heard about RM9267. I hope that it does not come to fruition. As a member of the Monrovia Emergency Preparedness Group, I use the 70cm band almost exclusively. Its performance far exceeds that of the 2 meter band. With our 70cm repeater located on the hill above our city, this band is capable of reaching into areas that are not readily accessed by a 2 meter repeater that is located not far away.

In addition to our Emergency Preparedness Group, there are a lot of fellow hams that access this repeater. We have found that the operating ethics on this band seem to be better than on the 2 meter band, where it seems that jammers and rude folks tend to hang out.

I have a substantial investment in 70cm equipment and would hate to see this go to waste.

Please don't let the Land Mobile Service do away with what has been a nice band to operate.

Thank You,

S. R. Reid, Jr.
KF6KTI

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OET

Subject: File Number RM-9267

James E. Lagerstrom
1372 Vallejo Street
Seaside CA 93955

May 28, 1998

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

Subject: File Number RM-9267

I am a technician-plus license, amateur radio operator, KE6VNN. I am a member of the Coast Amateur Radio Training & Operations Group (CARTOG) and the Navy Postgraduate School Amateur Radio Club (NPSARC). I am a member of the Board of Directors of CARTOG. I am a member of the Amateur Radio Emergency Services (ARES), Radio Amateur Civil Emergency Services (RACES), and the American Radio Relay League (ARRL). I oppose the Petition for access to the 70 CM Amateur Band and other non Amateur Radio spectrum submitted by the Land Mobile Communications Council (LMCC).

I am active in all of CARTOG's operations all around our local communities. We put on training courses, Radio Camps, science exhibits, demonstrations, and displays. For all of these, the 70-cm band is very important. Many of our educational activities are done in this band. When we are camping, hiking, or searching for lost people in the woods, 70-cm signals often work much better than any others.

The loss of access to the 420-430 and 440-450 MHz band segments would seriously affect my ability to provide important public service communications support to my community. In these areas, we use Amateur, fast-scan Television (ATV) along with ATV repeaters for many purposes. This is also where the bulk of our repeaters are located for FM voice. The loss of 70-cm access will result in unacceptable crowding and interference in lower bands, which are only a small fraction of the size of our 70-cm band.

I am especially interested in our digital modes. I set up and operate packet systems for our training, event, and disaster service deployments. We are adding many digital systems to our emergency response operations. We are also increasing the speed of the digital systems. These higher speed systems require more bandwidth than we have available in the 2-meter and 1.25 meter bands. The 70-cm band is over four times as big as these two bands together and has ample spectrum allocated for these purposes. This is really important as we add GPS position information with our Automated Packet Reporting System (APRS) systems. During the recent California floods, we used ATV along with APRS to give disaster workers real-time displays of damage with accurate position information. Without the 70-cm band, we could not do this at all.

I ask you to protect us from this attack on our precious ham radio frequencies. Thank you very much for your help.


James E. Lagerstrom
Ham License KE6VNN

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08T



Mobile Radio
Communications Service, Inc.

DOCKET FILE COPY ORIGINAL

P.O. Box 1487 • Durango, Colorado 81302
630 4th Avenue • Durango, Colorado 81301
Office: (970) 247-3194 • Fax: (970) 385-4505

May 27, 1998

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

Subject: LMCC Petition for Rulemaking (RM-9267)

As an authorized Motorola two-way radio dealer in southwestern Colorado, we want to extend our support of the Petition for Rule Making filed by the LMCC seeking new spectrum allocations for private wireless users. Also we appreciate the fact that the FCC has quickly placed the petition on public notice.

Our company has been in the land mobile two-way radio business for more than 30 years, providing community repeater service, paging, and repair for business and government in the Durango, CO area. We have heavy frequency saturation in VHF and UHF business and government spectrums. Our concern involves the difficulty new customers are having in locating frequencies that are not already congested and of course the potential impact this has on our sales of new equipment.

Our mountainous terrain and business diversification combine to require an expansion of the present private wireless spectrum in the 150mhz, 450 mhz, 800 and 900 mhz bands so as to protect the safety and enhance the viability of Four Corners businesses. Cellular and PCS do not meet these needs due to the limitations imposed by the mountainous terrain.

We urge the FCC to address these issues quickly as the problems associated with the lack of spectrum are increasing.

Regards,

A handwritten signature in cursive script, appearing to read 'Mike Marlan'.

Mike Marlan
Mobile Radio Communications Service
POB 1487
Durango, CO 81302

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DOCKET FILE COPY ORIGINAL

1116 Mission Street #D
South Pasadena, CA 91030-3246

May 26, 1998

ATTENTION SECRETARY

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

RECEIVED

JUN 2 1998

FCC MAIL ROOM

Dear Secretary:

I am writing to request that you reject RM-9267, the request by the Land Mobile Communications Council (LMCC).

I would still write you if only the hobby of amateur radio were at stake. But both public service and public safety are also involved. The W6FNO repeater system, with machines on Johnstone Peak in northeast LA County, with an elevation of 3,500 feet, and Onyx Peak well into the San Bernardino Mountains, over 9,000 feet high, enable motoring "hams" to report stalls, accidents and debris to those "hams" at home near telephones. They, in turn, call the Highway Patrol or local agency which has jurisdiction over the affected area. This system has also been used in assisting forest fire fighting and search and rescue efforts. It is also pledged to the Red Cross for use as a wide-coverage communication system in times of general disaster, such as a major earthquake or fire. Then there are those fun times such as assisting with the March of Dimes and an annual Christmas parade.

These two repeaters are linked by one of these coveted 420-430 MHZ frequencies. The loss of this link would render this wide-coverage system useless and greatly reduce the service we could render to the public. I personally handle approximately one thousand calls each year to law enforcement agencies and fire departments.

The Los Angeles County Sheriff's Department has organized a large number of "hams" to supply all its substations as well as its EOC in time of need and disaster. Its repeater, K6CPT, located on Mount Disappointment, 6,000 feet high, is controlled by a 420-430 MHZ frequency. This Disaster Communication Service is the official RACES group for this area.

The Condor system of repeaters on the 220 MHZ band links the San Francisco Bay area with southern California, a distance of over 400 miles. I am not certain of the number of repeaters involved, but they are all linked and controlled by 420 to 430 MHZ frequencies.

While we have had great cooperation from military RADAR on the 440-450 MHZ band--which is its primary user--it is quite probable that no such cooperation could be realized from the LMCC should RM-9267 be put into effect. Please reject this request for the sake of public service and public safety.

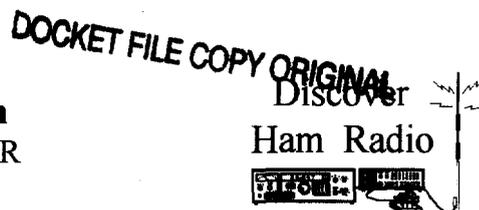
Sincerely,

John McCracken
John McCracken
N6LQT

OET



Eric J "Rick" Lagerstrom
Amateur Radio Operator: KN6FR
1372 Vallejo Street
Seaside CA 93955-5631



May 28, 1998

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

Subject: File Number RM-9267

I am an Amateur Extra Class licensee, KN6FR. I am the Executive Director of the Coast Amateur Radio Training & Operations Group (CARTOG) and Director of Training and Operations for the Naval Postgraduate School Amateur Radio Club (NPSARC). I oppose the Petition for access to the 70 CM Amateur Band and other non-Amateur Radio spectrum submitted by the Land Mobile Communications Council (LMCC).

I'm sure there are many who will write you on the technical merits and problems with the LMCC's proposal. I want to comment on impacts to CARTOG and our local communities. The 70-cm band the LMCC proposes to take over is a critical band to amateur radio and to many of our major activities in Central California. In the Monterey Bay area, CARTOG fields the bulk of operators during emergency response operations. The 70-cm band is critical to these emergency and disaster communications. Loss of any spectrum in this band will severely reduce our ability to provide these emergency communications services to our communities.

We run the area's amateur radio classes and put on demonstrations and displays promoting the excitement of science in schools and scouting organizations. The 70-cm band is very important in our educational activities. We use the 70-cm band extensively in all these activities for FM simplex, packet, FM repeaters, ATV, ATV repeaters, digital modes, and local ATV/TV links. Spread spectrum and satellite operations are being used increasingly in these community support areas. CARTOG also supports over a dozen, annual community events. These include:

- The 4th of July Parade and evening Fireworks Display in Monterey,
- Pacific Grove's Marching Band Festival,
- Various races and parades in Marina, California
- CARTOG monthly Radio Camps introducing ham radio to hundreds of kids and adults
- Naval Postgraduate School's Discovery Day
- Hartnell College's Safety Awareness Fair, Salinas
- Numerous other community events

Significantly, this proposal would eliminate our means to support the Big Sur International Marathon (BSIM). To support this event, I deploy over 80 hams on course and over 30 additional hams throughout the area. The 70-cm band is critical to our repeater and remote base operations, amateur TV (ATV), and digital links for the BSIM. The propagation characteristics of the 70-cm band enable us to communicate in areas where other bands are ineffective. As we deploy improved location systems, the spectrum available in the 70-cm band is increasingly critical.

I thank you for your consideration and support in this matter.


Eric J "Rick" Lagerstrom
KN6FR
Executive Director, CARTOG

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OET

Subject: File Number RM-9267

Robert J. Lagerstrom
1372 Vallejo Street
Seaside CA 93955

May 28, 1998

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

Subject: File Number RM-9267

I am a technician-plus licensee, callsign KE6VNG. I am a member of the Coast Amateur Radio Training & Operations Group (CARTOG) and the Navy Postgraduate School Amateur Radio Club (NPSARC). I am a member of the Board of Directors of CARTOG. I am a member of the Amateur Radio Emergency Services (ARES), Radio Amateur Civil Emergency Services (RACES), and the American Radio Relay League (ARRL). I oppose the Petition for access to the 70 CM Amateur Band and other non Amateur Radio spectrum submitted by the Land Mobile Communications Council (LMCC).

I support all of CARTOG's operations all around our local communities. I am especially active in our training courses, public service events, Radio Camps, and educational activities. In all of these activities, our 70-cm band is very important. Without our 70-cm band, we would be very crowded in our other, much smaller bands. In our many events, our remote bases output in the 70-cm band. The 70-cm band is our second most popular band and has a great deal of activity in both the simplex and repeater segments. This activity just wouldn't fit in any other band.

I work at all of our big, public service events. The loss of access to the 70-cm band would seriously affect my ability to provide this communications support. An example of the events where the 70-cm band is essential is the Big Sur International Marathon. We use the 70-cm band for our remote bases, simplex operations, as well as for amateur television and digital modes. Without the 70-cm band, it would be very difficult to provide quality communications support for this and many other events.

In school, amateur radio gives us many great ways to learn about electronics, physics, and engineering. There are many activities that are authorized on 70-cm which are excellent for us. Amateur, fast-scan Television (ATV) and ATV repeater activity is found on 70-cm. We are also working toward EME (Earth-moon-Earth) operations along with CW and SSB. If this petition takes most of our 70-cm band away, overcrowding will keep us from these activities. The 70-cm FM repeaters are also very popular. There are more technical discussions on these frequencies.

The 70-cm band is our second most popular band and the largest band under 1.2 GHz. If we lose this much frequency, we will not be able to provide the emergency services and do the training and educational activities that we are so good at now. I hope that you will stop this attack on our ham radio frequencies. Thank you for your help.

Robert J. Lagerstrom

Robert J. Lagerstrom
KE6VNG

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May 27, 1957

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Comment:

This proposal, if it includes loss of 420-430 and 440-450 band segments to the Amateur Radio Service will needlessly cause a variety of hardship to the amateur community and an immediate and possibly permanent reduction in the emergency and public service provided by amateurs.

One hardship is the burden placed on amateurs in continued use of existing equipment on the remaining segment of the band to not use the re-allocated segment.

Another hardship is that users will be constricted into 1/3 of the band remaining. LMCC's suggestion to offset this loss with new bands at 1390-1395 and 1427-1432 will probably not alleviate the constriction as all new equipment would have to be purchased.

Another hardship is that these new suggested bands are close to the existing band at 1240-1300. The result would be an undesirable decrease in the "harmonic spread" in the spectrum with an increase in odd-ball random segments.

Another hardship is the need for new terrain coverage knowledge along with new technical knowledge at these higher frequencies.

I suggest that requiring amateurs to purchase new equipment in order to continue providing emergency and public service along with many, many hours to develop the capability will cause many amateurs to throw up their hands and to abandon offering their service.

Why not, when the LMCC members add new frequencies which requires purchasing new equipment, choose frequencies that don't so heavily disrupt existing frequencies. If the suggested 1390-1395 and 1427-1432 bands could be reallocated to amateurs, why not reallocate them directly to the LMCC members? Is there justification for shuffling the frequencies as proposed?

Sincerely,

Alfred Williams

Alfred Williams k7puc
706 Frederick St NE
Olympia, Wa 98506

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OET

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

DOCKET FILE COPY ORIGINAL

Gentlemen:

I wish to express opposition to the Petition for Rulemaking RM - 9267. In RM-9267, the Land Mobile Communications Council, LMCC, demands the immediate allotment of the 420 - 430 MHz and 440 - 450 MHz bands for their purposes

I am the ARRL District Emergency Co-ordinator for Yuma County, Arizona. Our Yuma County ARES/RACES has been trying to link the entire county and parts of LaPaz County with a 2 meter repeater system using a UHF hub. It seems the 420 - 450 MHz spectrum is fully utilized by a variety of Amateur Radio services, primarily repeater links, and voice repeaters, and our attempts to obtain a frequency allocation in this spectrum met stiff resistance. We were told by the regional frequency coordinator that no frequency pairs were available. Most of the Laguna mountain range repeaters in California to the west of us have UHF control receivers or remote links in this band for their repeaters. Even if these frequencies seem to be unused, in an emergency they are quickly put to extensive use for operating NWS-Skywarn activities, Red Cross Health & Welfare Shelter communications, and tactical Civil Defense Communication Nets with various sections of a very big country. Yuma has a very active RACES/ARES group, and the repeaters and links are well utilized by members of this group.

Yuma County RACES Group is planning to provide Amateur Television coverage for the Yuma City/County Emergency Services at the EOC. There are three 6 Megahertz wide ATV channels set aside by the FCC for this purpose to provide an ATV Repeater Input, Output and one Simplex channel. The repeaters and links in this band are depended upon for public service communications. There is no way this volume of essential traffic can be shared, on a secondary basis, with the LMCC. In the remaining sector of the band, 435 - 438 is allocated, on a worldwide basis, for Satellite communications, which cannot be moved, since Space hardware is already in orbit.

There are several good reasons why we have an active RACES/ARES and Skywarn program here: Yuma and especially LaPaz counties are very isolated, we are over 200 miles West of Phoenix and Tucson, 200 miles East of San Diego and 300 miles south of Las Vegas, the nearest metropolitan areas with a lot of desert in-between. Yuma sits on a particularly turbulent part of the Mexican Border and we are 60 miles East of an area which contains the San Andreas Fault, a quiescent volcano and numerous Geothermal sites. Half of the city is susceptible to flooding from the Colorado and Gila Rivers. Interstate Highway 8 and the Southern Pacific Railroad cross the river at the same point and both carry a high volume of hazardous material through the center of the city. If a large Haz-Mat disaster occurred at this confluence ALL traffic would have to be routed 90 miles to the North at Blythe or through San Luis, Mexico. There are also two large military bases that store and expend huge quantities of explosive ordnance, and conduct a high volume of aircraft training flights while carrying ordnance. We are subject to flash flooding and microburst damage from the summer Monsoon thunderstorms which contain a high volume of electrical activity.

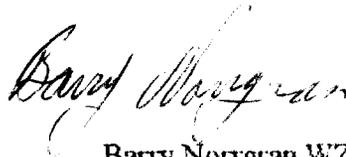
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In the recent episode of Hurricane NORA we had National TV news coverage and Yuma City/County Emergency Services including the Yuma County Sheriff were highly appreciative of our services and have realized the real need we have of the Radio Amateur Communications Service and technical background.

Please do not discourage this valuable voluntary public service by squeezing our available frequency spectrum which is one of our greatly appreciated advantages over public service repeaters that are immediately overloaded with disaster traffic. These link frequencies connect us to the outside world and the distant metropolitan areas around us. **We need them.** Due to the irregular, mountainous terrain and heat haze effects in the region, it is impractical to relocate these links into another frequency band.

There has been a huge investment, both on the part of private individuals and Ham clubs, and on the part of local government, through the RACES program. The compression of this band by LMCC's proposal would be a disaster to our Public Service Communications, and would leave the city isolated and vulnerable in times of emergency. To do so would be the equivalent of packing 12 people into a Volkswagen, it can be done but the result is completely dysfunctional. I urge you to reject the LMCC's request for the frequency allocation in the 420 - 430 and 440 - 450 MHz.

Sincerely,



Barry Norrgran WZ7V
ARES District Emergency Co-ordinator
11846 Sandra Ave
Yuma, AZ 85367
wz7v@juno.com

May 20, 1998

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

RE: RM9267

Dear Sirs.

I am writing to express my opposition to the above noted action that is before you. Specifically, the request to remove the 420-430Mhz & 440-450Mhz bands from the Amateur Radio spectrum. This would result in a severe hardship on the Amateur community as well as the American public.

The most compelling result would be the loss of FREE "technical" community service that is presently being provided by many thousands of amateur radio operators across the USA. Find a natural disaster in the country and you will find many of the principle volunteers helping out are amateurs. Check with some of the local police departments and you will find many use amateurs in some of their activities. Just see how many charity & public service events use amateurs for communications and other activities.

I can personally speak from experience on the above. I spend at least 250 hours a year doing community service to several agencies and groups. Most all these activities are related to communications via amateur radio. Our local sheriff's depart, in just the northwest corner of Los Angeles, has over 150 "active" members who logged over 27,000 hours community service, during last year alone.

Amateur radio provides the "training by doing" that binds us together to want to help out without a penny of repayment. A thank you and the ability to practice a loved hobby is all we ask in return. The "profit" bands could never come close to doing this.

Yes, the loss of these bands would severely disrupt our ability to help out. Please find another solution. Thank you for listening.

Sincerely,


STEVE BARTIS

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DOCKET FILE COPY ORIGINAL

RM-9267: Reallocation of the 420-450 Band to the Private Radio Service

10514 Sunnybrook Lane S.W.
Tacoma WA 98498
May 29, 1998

253-582-3844
e-mail: w7wg@Juno.com

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

Sirs:

As a licensed amateur radio operator since 1935 who now uses the 70 cm amateur allocation for a significant part of my operating time I am **opposed** to granting the Private Mobile Radio Service primary use of large portions of that band.

My use of that band is with the emergency services nets for this, Pierce, county. At my location, and frequently during mobile operations, the 70 cm link is much stronger and more reliable than the 2 meter link. I also use it for the nets of the Radio Club of Tacoma, a club which is officially coordinated with emergency services. The loss of that band certainly would adversely affect my operations and hurt younger, more active, licensed operators with a great future opportunity for service.

In 1935 my amateur radio activities on VHF were with modulated self-excited oscillator and super-regeneration receivers on 5 m and 2 1/2 meters, great learning experiences. Most of the experimentation and real research and development of these and into the higher frequencies, now designated as UHF, was being done by **radio amateurs**, and when World War II came along most of the men doing the technical work on the all-important new Radar systems in government and industrial labs, as well as training operators and technicians in the crucial first years of the war, had been radio amateurs. My first real job as a Radio Operator monitoring for "subversive stations" with the NDO Section (later RID) of the FCC in Boston was based primarily on my amateur radio experience. Then just after Pearl Harbor I was employed in the engineering labs of GE working on the new radar, again because of my earlier experimentation on my amateur radio station, and again most of the engineers were licensed radio amateurs.

Even though large corporations now, in contrast to those earlier days, spend huge sums of dollars in research and development and can do really outer-limits futuristic work, there is a present shortage of American engineers, scientists and technicians. While computers catch the imagination of most teenage students and lead toward future careers, amateur radio has the unique ability to catch the attention of technically oriented students and give them opportunities to experiment unfettered by "type-accepted" equipment.

On 70 cm and beyond is the region where there are the unique opportunities for the computer-literate to be fired up to experiment with computer technology communications unhampered by commercially regulated entities such as AOL. With secondary use of that band would come greater regulation and the dilution of the freedom to experiment with innovative systems of communication and the loss of that unique educational experience. For example, at our latest radio club meeting two club members demonstrated their own designed and built, portable, single channel repeater to enable search and rescue communication between rescue teams in separate deep valleys normally out of direct contact on vhf/uhf including cellular phones, very important in this part of the country. Being over-ridden by primary high-powered commercial systems would discourage use and interest in those bands. And, besides, it would set a precedent for encroachment and inevitably down-sizing of amateur radio, the originally most American of institutions.

Sincerely,


J. Worth Gurley, W7WG

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May 26, 1998

RECEIVED

Secretary
Federal Communications Commission
1919 M Street, NW
Washington, DC 20554
Re:RM9267

MAY 28 1998
COMMUNICATIONS ROOM

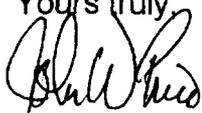
As an active Amateur Radio Operator, and Broadcast Engineer by profession, I feel I must respond to the proposal by LMCC to reallocate the 420-430MHz and 440-450MHz UHF bands.

Amateurs have for a number of years operated successfully as secondary users in this part of spectrum. I am very concerned about the LMCC backed proposal to reallocate these bands making the Private Mobile Radio Service (PMRS) the primary user. My concern is the ability of the PMRS to accommodate the great number of amateur UHF systems in operation in this country. These systems, usually repeaters, provide not only personal communications for licensed amateurs, but also are integral to volunteer (amateur) emergency communication networks established to assist the general public in times of crisis. These networks sometimes are the only means emergency services have at their disposal to dispense vital information after extraordinary events such as a tornado, flood or hurricane.

These UHF frequencies are also used quite extensively to link and control numerous amateur VHF repeaters throughout the country. The continued operation of these repeaters would certainly be disrupted with this proposed reallocation. The cost involved in reconfiguring these systems to use other frequencies after reallocation could possibly be cost prohibitive, and cause the cessation of operation of many important repeater systems.

I encourage the Commission to carefully consider the ramifications of such a reallocation in the UHF spectrum, and if at all possible, find frequencies other than these important Amateur assignments for the needs of commercial users.

Yours truly,



John W. Price
Amateur Radio Operator N7MWW
12026 81st Ave. NE
Kirkland, WA 98034

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RECEIVED

28 May 1998

JUN 2 1998

FCC MAIL ROOM

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

Regarding the matter of the LMCC's proposal to reallocate the 70cm band to PMRS, I am opposed to such reallocation. This band has been used on a secondary basis by the Amateur Radio Community for years for public service, disaster communications support, experimentation and interlinking of other disaster communications frequencies. To allow commercial use of these frequencies would render useless the Amateur Radio Operator ability to assist with communications during times of crisis.

I encourage the LMCC to seek other, more compatible alternatives in other frequency ranges.

Thank you for your consideration.



Duane L. Durringer, KX8D
1258 Miami Rd
Benton Harbor, MI 49022
616-982-0404

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OET

John M. Damron, P.E.
Mechanical Engineer

DOCKET FILE COPY ORIGINAL

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

RECEIVED

JUN 2 1993

FCC [unclear]

Re: RM-9267

Dear Secretary:

I have been an Amateur Radio Operator for many years, obtaining my Novice license at the age of 13, in January of 1962 and am proud of the service that Amateur Radio provides particularly in times of emergencies. This assistance would be in jeopardy if the referenced rulemaking were to take effect. I am very concerned about the potential loss of access to the 420-430/440-450 MHz frequencies for the Amateur Service.

In addition, loss of these frequencies would result in more crowding and interference in other parts of the band, or other bands, on frequencies allocated to the Amateur Service. Many Amateur groups use linked voice or packet systems on these frequencies for emergency services with a great deal of their own resources invested in equipment that benefits their communities.

Thank you for considering my opinion on this matter.

Respectfully,



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DOCKET FILE COPY ORIGINAL

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

RECEIVED
19 May 98

2 1983

FCC MAIL ROOM

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

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

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

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

Signed Sincerely



Cape Fear Amateur Radio Society Member

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DOCKET FILE COPY ORIGINAL

Milton Owens
N3XBV
2533 Mahon Street
Pittsburgh, Pa. 15219

May 28, 1998

RECEIVED

Attention: Office of the Secretary FCC
Room: 222. Concerning: RM 9267
1919 M. Street N. W.
Washington, D.C. 20554

Dear Sir:

I am writing to protest the proposal to take away from Amature Radio the 70 Centimeter Band (420 MHZ-450 MHZ). The Amature Radio Operators Of America must not lose this Band! We use these frequencies for more than just communicating with one another as a Hobby. These frequencies are also used during local and Regional Civil Emergencies by R.A.C.E.S. (Radio Amateur Civil Emergency Services), A.R.E.S.(Amateur Radio Emergency Services), and SKYWARN-For weather related emergencies.

During times of natural disasters or man-made disasters, Amateur Radio Operators volunteer their time and Radio equipment to assist local Emergency Services, by setting up communications links that can be used to transfere information about people, Lost and Found, or information about needed supplies and equipment. If telephne lines are down, Amateur Radio Operators are able to establish Radio Telephone link-ups FREE to those in the disaster area, so that these people can contact Family members outside the disaster area to let them know they are okay.

All of these actions by Amateur Radio Operators during Civil Emergencies, provide a Civil Service, so that the Frequencies used by Police, Fire, Ambulance, and Civil Government Authorities can be free for use to conduct the necessary communications that are critical during the time of a Civil Emergency.

In conclusion, I strongly urge the F.C.C. to allow the Amateur Operators to keep the 70 Centimeter Band (420MhZ-450MHZ), and not to reallocate this Band. Thank-You.

Sincerely,

Milton Owens
Milton Owens

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OET

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

DOCKET FILE COPY ORIGINAL

RECEIVED

REF: Petition RM-9267

JUN 2 1988

Dear Commission:

FCC MAIL ROOM

I am a licensed Amateur Radio operator. I would like state my strong opposition to RM-9267 as proposed by the Land Mobile Communications Council.

While I am not a member, I am familiar with the Edgewood Amateur Radio Society which has a long history, over 40 years, of being dedicated to disaster and emergency communications. The use of the 70 cm Amateur band is critical to their support of Red Cross Disaster communications in the West Covina and surrounding areas and also to assisting thousands of motorists each year with highway emergencies via their communications system. The E.A.R.S. club maintains an important repeater on 447.300 MHz on Johnstone Peak that services all of the Los Angeles basin. This repeater system allows their club members to assist with many public service events throughout the year. Like all of our repeater systems, it continues to be an emergency resource to the community, and at no cost to the tax payers, supported completely by the membership of their club.

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

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

Sincerely,



David Reynolds
K06XZ

Thank you for your support.

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