

DOCKET FILE COPY ORIGINAL

May 22, 1998

Reference: RM 9267

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

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MAY 28 1998

FCC (RM) 92-303

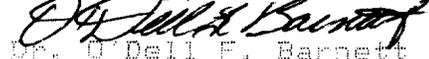
Dear Secretary:

I am sending this letter to express my opposition to the petition of the Land Mobile Communication Counsel to be granted a part or all of the Seventy (70) Centimeter Band presently allocated to amateur radio.

The granting of this petition would bring undue hardship on many Amateur Radio Operators. If you consider the number of Amateurs and the large amount of money they have invested in 70 CM equipment not to mention all the repeaters throughout the United States, you would have a sizeable investment. There are thousands of us who participate in regular and frequent nets and drills so that we will be ready and proficient in the event of local or national emergency. Taking away a portion or all of the 70 CM Band would be a great disservice to this country's safety.

I strongly and respectfully urge you to deny this petition of the Land Mobile Communication Counsel.

Sincerely,


Dr. O'Dell F. Barnett
KCBHFH

cc sent to:
Senator Byrd WV
Senator Rockefeller WV
Congressman Wise WV
Congressman Rahall WV

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LMABCDE

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To: RM 9267
Secretary
Federal Communication Commission
1919 M Street., NW
Washington, DC 20554

From: Jeffrey W. Harshman, N2LXM
5 The Arborway
Ocean, NJ 07712

Subject: RM-9267

Sir:

As a licensed Amateur Radio Operator I am very displeased to hear of the Land Mobile Communications Council request for reallocation of the 70cm Amateur Band. This UHF band as well as others are widely used by the Amateur Radio Service to provide Emergency Communication during time of Flood, Fire, Earth Quake, and Storm. Loss of this band would there for put many Lives and Property at risk. Such Requests should there for be very carefully weighed against the needs of the commercial interests and the needs of the People and agencies, both Federal, State, Local, and Nonprofit Organizations that the Amateur Radio Service Supports.

I there for ask the Federal Communications Commission to reject the request of the Land Mobile Communication Council on the grounds that the two services could not share the band with out harmful interference. Both to the Amateur Radio Service and the Federal Government.

Sincerely

Jeffrey W. Harshman, N2LXM
American Radio Relay League
Hudson Division
Northern New Jersey Section
Bulletin Manager

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**Comment on file number
RM-9267**

May 21, 1998

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

Gentlemen:

On April 22, 1998, the Land Mobile Communications Council (LMCC) filed a petition for rulemaking with the Federal Communications Commission to have two-thirds of the 420-450 MHz band (70 cm) reallocated to the Private Mobile Radio Service.

As a licensed Amateur Radio Operator I am opposed to this petition. I believe the LMCC proposal is incompatible with continued amateur use of this band. These bands are now heavily used by radio amateurs, operating in the Amateur Radio Service, for a variety of public service and public interest communications, and play a critical role in our ability to provide emergency, public service, and public interest communications.

Of particular concern to me is the possible infringement on and loss of frequencies of the linked systems (RAIL Link and THAT Link) used by amateur radio operator weather spotters throughout eastern and north central Texas to communicate with the Fort Worth office of the National Weather Service. Loss of this emergency service would seriously affect public safety throughout the area.

Very truly yours,



Carmen J. Abbott
Amateur Radio Station KC5CML
1717 Laurel Lane
Plano, TX 75074

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May 20, 1998

MAY 20 1998

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

RM-9267

Dear Commissioners:

RM-9267 proposes to make several frequency allocation changes to accommodate members of the Land Mobile Communications Council. While LMCC's spectrum needs are undoubtedly real and justified, one of their proposals would affect me and my community strongly.

LMCC proposes to reallocate 420-430 and 440-450 MHz to the use of their members. These frequencies are primarily assigned to the US government, but they are secondarily allocated for amateur use, and there, in fact, have their greatest use. Here in Southern California, a large and widespread network of voice repeaters, digital communications systems, and remote control systems make use of most of the band. Even with 30 MHz in which to spread, frequencies have to be carefully allocated to ensure that all the communications needs of the area are met.

Some of the communications systems on this band have been in place or evolving for many years; some are examples of newly emerging technology. We amateurs have made a strong commitment to public service, particularly in times of emergency, as the nation recently witnessed in Michigan, Georgia, and other areas damaged by tornadoes. In Southern California, most of the wide-area emergency communications systems are established in the 420-450 MHz band. This has become even more true since 2MHz were taken from amateur service and reallocated to UPS a few years ago.

Needless to say, the investment of the amateur community in this communications system is substantial, both in terms of money and time. Were these subbands to be reallocated, it would take literally years for the displaced systems to be replaced, even if another 20 MHz were immediately allocated to the amateur service. If, during this time, California's greatest fear – a monster earthquake – were to happen, the amateur communications system would be severely compromised.

The LMCC suggests in their petition that amateur use of these frequencies could easily be relocated, but they offer no suggestions as to how that might be done. In fact, if a different 20 MHz can be found so easily, perhaps LMCC should use that alternate band. In fact, it has occurred to me that LMCC may wish to take advantage of the fact that widespread amateur use of these frequencies has finally brought the price of equipment down.

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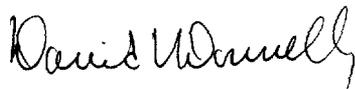
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OVER →

I ask that the commission give adequate regard for the public safety of the community by protecting the investment made by the Amateur Radio Service, and asking LMCC to find another range of frequencies that they can utilize.

Sincerely,

A handwritten signature in cursive script that reads "David V. Donnelly".

David V. Donnelly KF6XA
39540 Tinderbox Way
Murrieta CA 92562

May 21, 1988

Secretary
Federal Communications Commission
Washington DC, 20554

MAY 23 1988

RM 9267

Robert Haggard KC6BVF
3857 Kirkwood Ave.
Riverside, Ca. 92501

I am an active Amateur Radio operator involved in radio amateur civil emergency services (RACES), amateur radio emergency services (ARES), and the American Red Cross as a communicator. Participating in these capacities and serving the public on a regular basis is very frequently accomplished by utilizing the UHF amateur allocations from 420 to 450 MHz. To prevent Amateur radio operators from using the UHF bands could have a very detrimental effect on our ability to provide what I consider to be a vital service. Additionally, there are many aspects of amateur radio that I do not practice or participate in but I recognize as being valuable and vital to the interest of my community at large. Please do not reallocate our UHF amateur bands.

Thank you,



Robert Haggard, KC6BVF
3857 Kirkwood Ave.
Riverside, Ca. 92501

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DOCKET FILE COPY ORIGINAL

May 23, 1998

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

RE: RM 9267

Please be advised that the enactment of RM 9267 is not in the best interests of the general public that the amateur radio community is trying diligently to serve.

I am the Treasurer of The Philadelphia Area Repeater Association, which is an organization making heavy use of the 430-450 MHZ spectrum. Our primary repeater on the two meter band serves as the main back-up to our county owned RACES repeater, and is often used during local nuclear power generating station's simulated emergency tests, as we prepare for possible actual emergencies. This repeater uses several inputs scattered around the Delaware valley area that are fed into a voting system via 430-450 MHZ links, to give the coverage required for major metropolitan functions. We also operate a repeater in the 444 MHZ area, and find the diversity offered by this band important, often filling in voids in coverage where other bands fail.

All of this equipment is available and often used for public service events, as requests for communications help is never refused by the volunteer members of the association.

The cost and impractability of trying to operate our communications system without the current frequencies and equipment we now use would probably eliminate our service organization entirely. I hope the FCC sees the nature of this severe impact of RM 9267, as our situation is undoubtedly repeated many times over across the whole country.

Sincerely yours,



Elmer T. Schorle W3GSC
3172 Colony Lane
Plymouth Meeting, PA 19462-1929

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Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of

The LMCC's

REQUEST FOR DECLARATORY RULING RM-9267

Titled "An Allocation of spectrum for the Private Mobile Radio Services"

To: The Chief, Public Safety and Private Wireless Division

Wireless Telecommunications Bureau

DOCKET FILE COPY ORIGINAL

OBJECTION TO

REQUEST FOR DECLARATORY RULING

From: David Land KD5FX

2512 Bonnie

Ponca City, OK 74601

April 22, 1998

I am writing this letter to oppose this rule making. The Amateur Radio Service cannot afford to loose another band and still be able to provide the emergency communications we are called on to provide over and over during times of disaster. The 440-450 band is presently in use here in our part of Oklahoma to provide needed communications with the National Weather Service in Norman through a series a links on UHF and VHF. Using this system we can contact the NWS with up to the second weather information from the Okla./ Kansas border to the Okla./Texas border. Without the use of the 440-450 band this would not be possible. I also understand that the NWS has already written you in support of the Amateur Radio Service on this matter.

In addition to the NWS link we often use the UHF band as part of our storm spotting and public service events that we hold here in Kay County, Okla. The VHF repeater is used for the actual storm net but the UHF repeater often gets used for auxiliary communications. I hope you will give this request no further notice and drop it now.

Signed,

David R Land

David R. Land KD5FX

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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
Henry J. Labarrie W6BPA
17019 Gault St
Van Nuys, Ca. 91406

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MAY 23 1998

Mason, OH
May 23, 1998

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

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RE: RM-9267

Gentlemen:

I am writing to express my objection to the idea of allowing other interests to use the Amateur Radio 70cm band or any part thereof.

As you know, Amateur Radio Operators provide valuable communications service in times of disasters such as tornadoes, hurricanes, floods, etc. We provide assistance to local police and rescue operations for searching for lost people, etc. We also work with various civic groups to provide communications for parades, and various charitable events.

Please deny the request for our spectrum and allow us to keep up these services.

Thank you for your consideration of this matter.

Sincerely,

Thomas R. Walker

Thomas R. Walker, W8SBD
209 Dawson St.
Mason, OH 45040
(513)398-1516
trwalk@juno.com

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May 15, 1998

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

Subject: RM-9267 Opposition

As member of Chester County ARES RACES and registered with Chester County Department of Emergency Services, South Eastern Pennsylvania and as a licensed amateur radio operator, I'm in total opposition to the request of the LMCC for access to the 70 cm band and any of the other amateur bands. These bands represent a strategic capacity of communications outside any of the commercial assigned bands in time of severe disasters or war emergencies. The distribution of amateur frequencies through MF, HF, VHF, UHF represent a unique capability to establish emergency communications at any time of day or night, over any distance, direct or indirect, without reliance on any commercial utility or service.

Further more, the existence of thousands of volunteer amateur radio nets, in all parts of the United States, provide local, intrastate and interstate networks that can function outside any commercial reliance is unique and must be preserved. Few countries anywhere in the world have this communications alternative. A few significant local factors for this opposition are stated below, many of which parallel those of hundreds of counties and cities throughout the United States.

Opposition purpose:

Limerick Nuclear Power Station EPZ (10 mile radius) and Three Mile Island NPS 55 miles West of the Greater Philadelphia Suburban Region, Population in excess of 2 1/2 million.

Commercial aircraft flight paths of, Philadelphia, Lancaster, Reading, Chester County.

Decades of ARES RACES service, planning, technical system development in place, 70 active volunteer Chester County Response Teams, 7 Zones (55 Zip Codes), 6 Hospitals, 2m/ 220 / 70 cm repeaters and links, CCAR system currently active 24 hours a day, 10 privately owned AC generators can be put into service for CCAR amateur radio emergencies.

Amateur Radio, the enormous National Resource.

There is no substitute for a well planned, strategic, back-up, STAND ALONE, communication system supported by amateur radio volunteers that respond to any major call in support of Chester County Department of Emergency Service, sponsoring civil defense organization, and related agencies. The Amateur Radio Bands (including 70 cm) must remain in tact with the promise to be continually available. The expansive and flexible capability of up to half million licensed amateur radio operators coast to coast are proven and ready if needed. This is an enormous National Resource of free (no expense) dedicated, technically equipped, volunteer communicators, outside commercial communications limitations.

LMCC and all other agencies, corporations and their technical staffs must seek spectrum availability outside the Amateur Bands.

Yours truly,



Harvey Williams Jr., KB3DU
Chester County ARES RACES, Pennsylvania

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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,

KEVIN TERRISAN

KE6WRW



5/15/98

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John A. Minger
5257 Stratford Road
Los Angeles, CA 90042-1703

May 18, 1998

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

DOCKET FILE COPY ORIGINAL

Ref: RM-9267

Dear Commissioners:

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

The frequencies addressed in RM-9267, (420 MHz - 430 MHz and 440 MHz - 450 MHz) are very important to our continued success in serving the public. These frequency band segments include important repeater, control, and amateur television 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 show 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 will continue to be a vital communications resource to the public during emergencies and disasters if RM-9267 is not approved.

Sincerely,

John A. Minger

John A. Minger

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MAY 20 1998
FEDERAL COMMUNICATIONS COMMISSION

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21 May 1998

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

I am an active Amateur Radio Operator. I use the 70 cm Ham band daily. I have several pieces of amateur radio equipment that transmit and receive on the 430-450 Mhz band and have recently purchased some equipment that I intend to use for Earth-Moon-Earth (EME) communications on that band. I sincerely hope that the Amateur Radio Community can keep this small portion of our allocation from falling into the hands of the Land Mobile Communications Council(LMCC). Hams are the backbone of emergency communications when disaster strikes. We practice all the time. We do our public service at no cost for those who benefit. The petition from the LMCC for access to the 70 cm Ham Band will affect me personally and would affect Hams everywhere in their ability to provide needed public service. Thank You for noting my views on this subject.

Sincerely,



Richard W. McDANIEL
KC5OEG
143 Stonegate South
Boerne, Texas 78006-3410

Copy to: American Radio Relay League (ARRL)
Kendall County Amateur Radio Society (KARS)

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RM - 9267

David O. Hachadorian
2750 W. 22nd. St.
Yuma, AZ 85364
May 16, 1998

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

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. Under their proposal, the Amateur Radio Service would be a secondary user of this spectrum, on a not-to-interfere basis.

In this area, Yuma, Arizona, the 420 - 450 MHz spectrum is fully utilized by a variety of Amateur Radio services, primarily repeater links, and voice repeaters. We recently attempted to obtain another frequency authorization for a repeater link in this spectrum, and were told by the regional frequency coordinator that none were available. 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, 430 - 440 MHz, 435 - 438 is allocated, on a worldwide basis, for Satellite communications, which cannot be moved, since Space hardware is already in orbit.

The repeaters and links in this band are depended upon heavily for public service communications. Yuma has a very active RACES/ARES group, and the repeaters and links are heavily utilized by members of this group. There are several good reasons why Yuma has an active RACES/ARES program:

Yuma is isolated, 200 miles East of San Diego, and 200 miles West of Phoenix.

Yuma sits on a particularly turbulent part of the Mexican Border.

We are just 60 miles East of the San Andreas Fault.

Much of the city is susceptible to flooding from the Colorado and Gila Rivers.

Interstate Highway 8 and the Union Pacific Railroad both carry a high volume of hazardous material through the center of the city.

There are two large military bases that store and expend huge quantities of explosive ordnance, and conduct a high volume of aircraft flights while carrying ordnance.

We are subject to flooding and wind damage from summer Monsoon thunderstorms.

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The links in 420 - 450 MHz tie the local repeaters into both San Diego and Phoenix. In Hurricane Nora, which severely damaged Yuma last September, links in the 420-450 MHz band were utilized by a Red Cross mobile assistance team to maintain communications with their headquarters in Phoenix. These links were also utilized by the County's Emergency Operations Center, to communicate with their counterparts at the state level in Phoenix during that emergency. Due to the irregular, mountainous terrain in the region, it is not practicable to relocate these links into another frequency band.

There has been a huge investment, both on the part of private individuals, and on the part of local government, through the RACES program, in Amateur Equipment for the 420 - 450 MHz band in the Yuma area. The loss of this band would be a disaster to Public Service Communications, and would leave the city isolated and vulnerable in times of emergency. I urge you to reject the LMCC's request for the primary allocations in 420 - 430 and 440 - 450 MHz.

Sincerely,



David O. Hachadorian

Amateur Radio Licensee, K6LL

DOCKET FILE COPY ORIGINAL

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

RE: RM 9267

Dear Sir or Madam:

I am an amateur radio operator and am responding to the demand by the Land Mobile Commission's for radio spectrum in the amateur bands.

Amateur operators support many emergency services through A.R.E.S. , R.A.C.E.S. SEARCH AND RESCUE, FIRE DEPARTMENTS, ALZHEIMERS, RED CROSS, CIVIL AIR PATROL, HOSPITALS, AND OTHER PUBLIC SERVICE AGENCIES.

These services rendered to public agencies are done by amateurs giving time and efforts at NO COST to the agencies. California, like many other states, need and use amateur radio in time of need: Earthquakes, Floods, Fires, Wildland Fires, Power Outages, Inclement Weather, Animal Rescue and Lost Persons.

We amateurs and supporters ask you to reject the demand for change in the ammateur frequency spectrum and especially in the 420 Mhz. to 450 Mhz. range.

Sincerely,

CINDY B. LUDLOW
KE6AFI

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

MAY 28 1998
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In the Matter of)
)
An Allocation of Spectrum for)
Private Mobile Radio Services) RM-9267

To: The Secretary,
Federal Communications Commission:

I am writing in opposition to the LMCC proposal in RM-9267 to re-allocate the Amateur Radio 420-430 and 440-450 MHz bands to shared access to private land mobile services. I further believe that an upgrade to Co-Primary use on this band is also warranted to dissuade future attempts by private commercial services to usurp Amateur allocations in this vital area of the spectrum.

I believe that the Amateur service would be adversely affected by this proposal, and that great harm would result in the service ability to provide emergency communications during times of local and national emergency.

So that you may understand that I speak with some experience in this area, I would like to say that I am an active Radio Amateur Civil Emergency Service member and that I participated in the response to the TWA Flight 800 disaster in Center Moriches, NY.

Amateur Radio is a national resource and I feel that we must ensure future generations of the chance to experience this excellent service and the thirst for knowledge that comes with it. By ensuring them a place, we thus assure our own future and the continuation of our world leadership in telecommunication and space and satellite technology.

Thank you very much,

Richard J. Florio
FCC Licensed Advanced Class Amateur Radio Operator W2TMA

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BUTLER COUNTY AMATEUR RADIO EMERGENCY SERVICES

May 22 1998

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MAY 28 1998

FCC MAIL ROOM

Raymond L. Albert, Jr. N3XCD Butler County ARES EC
PO Box 83
Harmony PA 16037

Secretary
FCC
Washington DC 20554

File number RM-8967

As the Emergency Coordinator of ARES in Butler County I am responding to the request of the LMCC to the FCC. I plea to you to please do not permit the allocation of the 70cm band. In doing so would be of great devastation in emergency assistance. The ARES group in our county has been called upon numerous time to furnish communications for police, fire, EMS, EMA, and search and rescue teams when all normal communications are down or overloaded.

In our county the Emergency Center owns 2 440MHz repeaters and we are working on putting up the third one. Butler County 911 Center has a communications room set up for the ARES and RACES groups to use in emergencies. Having this ability takes a burden off much unneeded communications on the 911 frequencies. We are able to receive the information and pass it to the center. Our 440MHz repeaters can be linked into 2m and 220MHz repeaters to make coverage in the area more efficient.

The 440MHz are used in cross band with 2m, helping with communications in buildings when we are called to work inside. Other bands are not as efficient in doing this job. We use handhelds in the buildings talking out to a 2m 440MHz cross band radio and then it is sent to a base radio on net control. Taking our access to the 440MHz will make this impossible to complete.

The use of the 440MHz by the National Weather Service is of great essence in reporting and receiving weather reports in severe storms. There are plans right now to install a 440MHz repeater in the Mountain Top area of Luzerne County, PA. Doing so will link hundreds of amateurs in Maryland, New Jersey, Delaware and Pennsylvania to the NWS to report severe weather so that the NWS can pass on potential weather warning and watches so that precautions can be taken. Loosing the access to the 440MHz will make this link impossible and we'll lose the ability to pass on warnings for safety precautions.

Allocating these frequencies to the LMCC will make the agencies that we serve have to pay for the use of the communications. We as amateurs receive nothing for our service to them. The purpose of ARES is to furnish communications for local, county, state, and federal agencies such as the Red Cross and Salvation Army.

I as an ARES Emergency Coordinator plea to you to please do not take the access of the 440MHz frequencies from us. We are here as volunteers to many government agencies in times of emergencies and taking the access of the 70cm band may make our job impossible for the health and welfare of the citizens of our nation.

Raymond L. Albert, Jr. N3XCD
Butler County ARES EC

Raymond L. Albert Jr. N3XCD

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MAY 28 1998

FCC MAIL ROOM

Carl J. Quijas
WBØTUE
1420 SW Highland Dr.
Lee's Summit, MO 64081

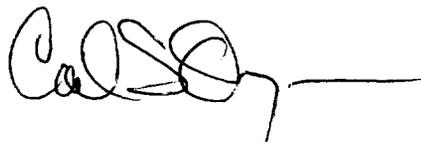
25 May 1998

RM-9267
Secretary, FCC
Washington, D.C.

I would like to comment on the petition by the Land Mobile Communications Council to reallocate 420 to 450 MHZ. We as amateur radio operators use these frequencies for our volunteer work in public service. The loss of these frequencies to other users would severely limit our ability to provide public service communications in case of a disaster. As you know, they build other public and commercial communications around a high-tech infrastructure that usually becomes saturated or unusable immediate after any disaster. In Oklahoma City after the Federal Building bombing, cellular phones were saturated in the area to the point they were unusable. The same thing happened after the last hurricane in Florida and after tornadoes in the Midwest. After these events, amateur radio steps in and provides a public service that does not cost the government anything. We use and depend on these frequencies the LMCC would like to reallocate to provide this service and help our fellow citizens.

It is our charter in this hobby to lessen the burden of government by providing any emergency communications we can. We do this at our own expense and time. We train and practice regularly for these events while hoping they never happen. Our daily non-emergency use of these frequencies is a part of that training. If these frequencies are reallocated to the LMCC for some commercial or even private use, who will step up and take over the job of helping with *simple* communications like the amateur radio operator can provide? Please take action to allocate these frequencies for continued amateur use!

THANK YOU



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Daniel L Rounda
23662 195th Street
Leavenworth, KS 66048-9811

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May 25, 1998

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

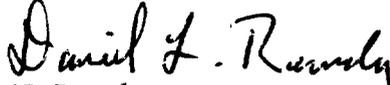
Dear Sir:

I wish to register my opposition to RM-9267. The secondary allocation for radio amateurs in the 70cm band is incompatible with the proposal of the Land Mobile Communications Council.

Our local amateur radio club, the Pilot Knob Amateur Radio Club, maintains three repeaters, one of which operates on the 70cm band. This repeater represents a substantial investment for the repeater operator and a valuable resource to the club and the community. The location of 440mhz repeater in Leavenworth County is an area which is not well covered by the other available 2 meter repeaters.

Thank you for your consideration.

Sincerely,



Daniel L. Rounda

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MAY 28 1998

FCC MAIL ROOM

5-23-98

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

Ref: RM-9267

Dear Commission:

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

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

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

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

Sincerely,

Robert L. Payne

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FSCDE 024

John T. Berry Af4CY
Rt. 3, Box 141B
Culpeper, VA 22701

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May 26, 1998

To: The Secretary
Federal Communications Commission

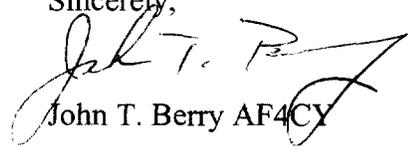
STATEMENT OF OPPOSITION TO RM-9267

I am writing in opposition to the Land Mobile Communications Council's proposal to re-allocate the 420-430 and 440-450 MHz frequency spectrum to commercial, private, land mobile applications. I have been a licensed amateur for nearly three years and have achieved an Extra Class License. I am a Volunteer Examiner and have been involved in numerous public service events and on two occasions have helped with emergency communications when there was flooding in our county as well as surrounding counties. The 420-450 MHz Amateur allocation is the second most used Amateur VHF/UHF band and it very important for us to keep this frequency allocation for use in times of emergency.

The LMCC has requested "sharing" this band with Amateur operations yet provides no explanation for how "sharing" might occur. 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 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.

In conclusion, 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 of 420-450 MHz.

Sincerely,


John T. Berry AF4CY

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May 25, 1998

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

I am opposed to the implementation of LMCC's Petition as the Trustee for W7JHQ Repeater of the West Valley Amateur Club operating on 449.80 mHz . This Repeater is located on the Boswell Memorial Hospital , Sun City , AZ and serves as emergency communications facility by our Club members when needed by the Hospital during their communications outages ! It also serves during routine drills for civic preparedness by the amateur community at large. We see no public benefit for yet another commercial communications service. I do not believe we could continue our public service functions in times of emergency as a "secondary user" of the frequency.

Thank you.

Thomas H. Watts

Thomas H. Watts - NY7S
19844 N. Shadow Mountain Dr.
Surprise, AZ 85374

cc: FCC - 4 ✓
Mgr. Corporate Comms.
Boswell Hospital - 1
President-WVARC - 1

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May 25, 1998

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

Ladies and Gentlemen:

This is to advise you that, in my opinion, the Petition recently submitted to you by the Land Mobile Communications Council (LMCC), seeking reallocation of the frequencies 420-430 MHz and 440-450 MHz to their various radio services, is totally incompatible with continued Amateur Radio usage of the frequencies 420-450 MHz.

This 420-450 MHz continuous band of frequencies is now being used very successfully for a multiple of purposes, without problems, by Amateur Radio users on a secondary, shared basis with the federal government for radiolocation (military radar) purposes. Bringing additional radio services into this range of frequencies would seriously affect the current good working relationship of users within the band. It would also very seriously affect the ability of Amateur Radio to serve the public need for emergency communications services when needed. Amateur Radio has a well-earned position of respect in this regard, having furnished emergency communications to help thousands of service people and storm victims cope with floods, hurricanes, tornadoes, ice/snow storms, and earthquakes for many years.

Respectfully yours,

Ted Zeblisky

Ted Zeblisky W2YGT
14216 West Wagon Wheel Drive
Sun City West, AZ 85375-2232

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