

**Edgewood  
Amateur  
Radio  
Society**

**W6NRY • 447.300-**

**SERVING THE PUBLIC SINCE 1957**

**RECEIVED**

**MAY 28 1998**

May 19, 1998

**FCC MAIL ROOM**

**DOCKET FILE COPY ORIGINAL**

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

**Ref: Petition RM-9267**

Dear Commission:

I am a licensed Amateur Radio operator and a member of the Edgewood Amateur Radio Society in West Covina, California. I would like to state my strong opposition to RM-9267 as proposed by the Land Mobile Communications Council.

Our club has a long history, over 40 years, of being dedicated to disaster and emergency communications. The use of the 70 cm Amateur Radio band is critical to our support of Red Cross Disaster communications in West Covina and also to assisting thousands of motorists each year with highway emergencies via our communications system.

The Edgewood Amateur Radio Society maintains an important repeater on 447.300- MHz on Johnstone Peak that services all of the Los Angeles basin. This repeater system allows our 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 our club.

Our club also maintains an 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 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 our club operations that could never be replaced. Please do not approve this misguided petition.

Sincerely,

*Margaret A. Dayre*  
RD6 TUA

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MAY 28 1998

FCC MAIL ROOM

BUTLER COUNTY AMATEUR RADIO PUBLIC SERVICE GROUP, INC.

PO Box 141, Prospect PA 16052-0141

May 22, 1998

Secretary  
FCC  
Washington DC 20554

File number RM-9267

The Butler County Amateur Radio Public Service Group is responding to RM-9267. The loss of the access to the 420-430/440-450MHz will be a great devastation to the area. The amateurs in this area have been called upon many times in the past to furnish communications. We have furnished communications for fire companies, EMS, police, search and rescue teams and EMA when all the normal ways of communications are down due to power outages or overload to the emergency center. Our ability to furnish these communications for these agencies has been using the 70cm bands. The loss of access to these will make our helping these agencies almost impossible.

The Butler County Emergency Center owns 2 440 repeaters and has the allocation for the third repeater. The county has repeaters on the 443.90MHz and 443.20MHz and at the Emergency Center has a room set up for the amateurs to use when there is an emergency and our communications are of essence for the emergency. Our amateur radio room has auxiliary power so we can communicate when all normal ways maybe down. At the 911 center we pass the information directly to the emergency center so they can act upon it.

The 440 band is used for cross band communications on simplex with the 2m band. This enables us to pass information using handhelds to base cross band radio to net control. Doing so helps us pass on information that scanner listeners and the news media doesn't need to have until a press release. The 70cm band has the ability to transmit from inside buildings on handhelds to a base radio, where the other bands are not as effective.

The Public Service Group also does communications for a number of Ride-a-tons, Walk-a-tons, Marathons and parades. The group uses the 440MHz for much of the communications in the events. The span of frequencies on the 440MHz makes using these a great source for us.

Taking the access to the 440MHz will also effect the help that we give the National Weather Service. Many of the amateurs are part of the Skywarn program by providing conditions when severe weather strikes. There are plans to install a 440MHz repeater in the Mountain Top area of Luzerne County, PA that will tie hundreds of amateur radio operators in New Jersey, Maryland, Delaware and Pennsylvania to the National Weather Service. If this proposal for the reallocation of the 440MHz band goes through this emergency link will be lost.

The amateurs furnish these communications for all these agencies and emergencies at no charge. But if the request by the LMCC is done these agencies will have to pay for the use of these services. Many of the agencies are local, county, state and federal agencies and we support these by providing the needed communications.

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We the Butler County Amateur Radio Public Service Group plea to you to turn down the request of the LMCC to reallocate the 440MHz band to them. The Amateurs of this Nation provide a service that is very important to the safety and welfare of our neighbors and citizens of this Nation. Taking this band from our use will make our work in natural disaster strikes and emergencies very hard and sometimes a failure.

Thank you for considering our request on the matter of RM-9267.

Butler County Amateur Radio Public Service Group  
Submitted by Secretary; Christin J. Albert N3YTD

*Christin J. Albert N3YTD*

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MAY 28 1998

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May 25, 1998  
Secretary  
Federal Communications Commission  
Washington, D.C. 20554

Subject: RM 9267

Gentlemen:

The Land Mobile Communications Council has demanded reallocation of most of the 70 centimeter Amateur band over to private mobile operations with private land mobile designated as the primary user. This simply should not be done.

The 70 centimeter band is the second most used band in the Amateur Radio Service. Amateurs use this band for mountain top repeaters with about 900 repeaters in use in the state of California alone. In addition the band is also used satellite downlinks, link control frequencies, Amateur Television input and output links, and regular 2-way amateur communications. All these frequencies are heavily used in disaster communications also.

The Land Mobile Communications Council has stated a willingness to permit Amateur Radio to retain some sort of secondary status but only on a non-interfering basis. This cannot logically be accomplished, since Amateurs use virtually all frequencies in the 70 centimeter band for the purposes stated above.

Therefore, I wish to register my opposition to the LMCC's proposal.

Sincerely,

Stephen C. Alborn, KE6PY  
827 Paula St.  
Escondido, Ca. 92027-1753  
Telephone: (760)743-4681

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MAY 28 1998

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1804 Cottington Drive  
Schaumburg, IL 60194  
May 25, 1998

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

Reference No. RM 9267

Dear Chairman:

I am writing you to express my concern about RM 9267. It appears that the Land Mobile Communications Council has targeted our 420 to 430 MHz and 440 to 450 MHz bands to fill their needs for spectrum space. As you are probably aware, this is the most heavily used UHF ham band in the Chicagoland area. This band provides not only a means to chat with my fellow hams on the way to work, but also support a number of emergency services as well. The Chicago metro area has been served by a group of hams operating on this and other bands to provide emergency weather spotting and notification to and from the National Weather Service in Romeoville, Illinois. This emergency weather net, using the 2M & 70cm Amateur bands is led by the former Civil Defense director for Cook County. They meet on a net every Monday evening at 8PM. This group's function is to ensure there are trained operators ready to handle emergency weather situations and assist the public when the need arises. The net also passes information on available emergency weather spotter courses that are available in the area as well as to pass the latest ARRL bulletins as they become available. This group meets every Monday evening 52 weeks a year and has done so for the last 40 years. This club station also transmits to its members and other ARES organizations all weather data it receives from the National Weather Service on 147.06 MHz RTTY. This is only one of the services the hams provide and if we loose the spectrum space it would be quite a loss to the Chicago Metro Area.

My wife and daughter have passed the exam and received their no code technician licenses (KB9QXG and KB9QYY) and they been able to use their radios to help us stay together in a large crowd such as in the shopping mall, an amusement park and on vacation this past summer. They are also very interested in using the autopatch on our repeater to make a phone call in an emergency. Loosing this band would all but kill their interest in amateur radio.

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MAY 28 1998

FCC MAIL ROOM  
All of us check into the Monday night weather net almost every week. We think  
it is a valuable emergency service.

I am asking you to consider these and the things you are hearing from the other  
amateurs and let us keep the spectrum space so that we can continue to provide  
these services that we provide to the community for free. Thank you for your  
consideration.

Sincerely,

*Michael Bafaro, Kathleen Bafaro, Jennifer Bafaro*

Michael P. Bafaro

WA9ZEO

Kathleen Bafaro

KB9QXG

Jennifer Bafaro

KB9QYY

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MAY 28 1998

FCC MAIL ROOM

Ralph H. Toyama  
2440 Date St. #306  
Honolulu, HI 96826  
May 25, 1998

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

DOCKET FILE COPY ORIGINAL

Re: Land Mobile Communications Council, Petition RM 9267

Dear Sir:

I am writing to express my opposition to the proposal by the Land Mobile Communications Council in petition RM-9267, that the radio frequency bands at 420-430 MHz and 440-450 MHz be reallocated for the use of the Private Mobile Radio Service.

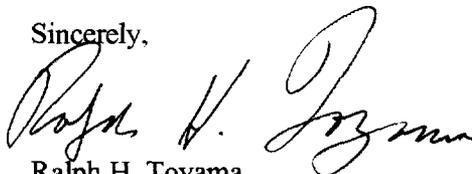
These bands are heavily used by the Amateur Radio Service across the country, especially with the growing popularity of VHF and UHF operations and heavy congestion in the 144-148 MHz band. These bands are used for activities including public service communication, emergency assistance, and disaster relief. These frequencies are also used for linking and control purposes, and therefore their loss would have implications for the operation of repeaters, repeater networks, and packet data systems in other bands as well.

The LMCC proposal allows for continued use of these frequencies by radio amateurs on a secondary basis. Frankly, I do not see how this is practically possible. I believe that the proposal inaccurately characterizes radio amateurs' use of the 70 cm band, to convey the impression that the amateur radio community's needs could continue to be reasonably served under the proposal. The fact is, these bands constitute a valuable resource that is actively and constructively used, which would be lost to radio amateurs under the proposed reallocation.

Such a loss would create a significant hardship. Congestion on other VHF and UHF bands in many areas would make it difficult to move activities and functions to other frequencies. It would also create financial hardships for individual amateurs and groups. In Hawai'i, where we face significant geographical challenges, I am deeply concerned about what we would face if our repeater networks had to be rebuilt, particularly when so much of it is built, managed, and paid for by private individuals and small clubs. The consequences are far reaching, and would be felt not only by radio amateurs, but also by the communities we voluntarily serve.

I urge you not to grant the reallocation proposed by the LMCC.

Sincerely,



Ralph H. Toyama  
Licensed Amateur Radio Operator, NH6PY  
Volunteer - Oahu Civil Defense Agency, Radio  
Amateur Civil Emergency Service, Amateur  
Radio Emergency Service.

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MAY 28 1998

FCC MAIL ROOM

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

In the request from )  
Land Mobile Radio Council ) RM 2967

COMMENTS ON THE PROPOSAL TO  
REALLOCATE SPECTRUM IN 420-450

Comments by Howard P. Iko Amateur operator WB2BQW and  
General Radio License holder PG-2-19039.

I am strongly opposed to any plan to reallocate or any fur-  
ther sharing of any portion of the 420 to 450 band.

INTRODUCTION AND SUMMARY

In the request to the Commission from the Land Mobile Radio  
Council, the band 420-430 and 440-450 would be on a shared basis.  
This concept is totally incompatible and unacceptable to the  
existing service provided by amateur radio operations. These  
band segments already suffer from radar noise and cause serious  
loss of range and audio recovery. Any further sharing will  
further increase the interference on this band. My primary use  
of these band segments are for radio links and repeaters. These  
links support the largest, and widest coverage, emergency system  
in the north east. Because we must depend on the use of these  
links for emergency operations over wide areas it is imperative  
to insure the continued reliability of these links. Any inter-  
ference could impede the flow of valuable communications and  
jeopardise life and property.

BACKGROUND

Some time ago cable television industry, the ARRL and the  
FCC were involved in proceedings about CATV's incompatibility  
with Amateur operations at 145.250. Though everyone went away  
thinking that the problems could be resolved the interference and  
incompatibility continues to threaten life and property.

More recently 2 Megahertz of 220 was reallocated to other  
services. Much of our linking and all of the longer paths were  
done at 220. We have just started to recover from this through  
the use of 420, 430 and 439 links. This has involved more sites  
which are never easy to come by and more equipment.

CONCLUSION

The WB2BQW system has 8 simulcast transmitters 15  
voted/radio linked receivers covering part of 8 states in the  
north east. These link channels approximately 45 of them are  
used to support this system. Any shared use would be a loss for  
this and the emergency network I have built. We currently pro-  
vide coverage for ARES, RACES and interface with other sections  
outside of the Hudson Division. No other single repeater cover-  
ers more land in the north east or is more relied upon. We can  
not rebuild again, 902 to 928 is already shared and we do not  
have the finances, sites or time to do this again.

PLEASE DON'T TAKE ANY MORE SPECTRUM AWAY FROM AMATEUR RADIO.

UNABCD E  
067

**MONSANTO AMATEUR RADIO ASSOCIATION, INC.**

**800 N. LINDBERGH, ST. LOUIS, MO 63167**

May 20, 1998

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MAY 28 1998

FCC MAIL ROOM

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

DOCKET FILE COPY ORIGINAL

Reference: RM-9267

Dear Sir:

I am writing as the Secretary/Treasurer of the Monsanto Amateur Radio Association, a not-for-profit corporation having eighty members, all of whom are active radio amateurs. I am writing to express the Club opposition to the changes proposed in the subject document.

Amateur radio has a long history of public service and the changes proposed will greatly reduce the ability of amateurs to provide such service. Some of the reasons for our opposition are as follows:

1. We now operate a repeater in the affected bands. As a club, we have thousands of dollars invested in equipment. How will we replace this equipment and how will we be able to continue to provide emergency service once we are no longer permitted to operate in this part of the band?
2. We operate link receivers in this portion of the band, serving our 2 meter repeater. Again, how will we be able to replace our investment and provide emergency service if we loose the ability to operate in this portion of the band? Our most recent service involved a chlorine leak where we provided emergency back up service to the local police.
3. The closing of the designated bands to amateurs will force more traffic on the remaining bands, thus making public service much more difficult because of band crowding.

These are but three of the many reasons we respectfully request that this petition be denied. It seems to us that the public good far outweighs the commercial needs outlined in the petition.

Sincerely,



Raymond K. Chafin  
Secretary/Treasurer

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CODE

DOT

# *From The "Shack" Of KT4ER, Bull Run Mtn.*

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May 26, 1998

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MAY 28 1998

RM-9267

Secretary

Federal Communications Commission

1919 M Street., NW

Washington, DC 20554

DOCKET FILE COPY ORIGINAL

FOO MAIL ROOM

Dear Secretary,

As a FCC licensed Amateur Radio operator, I am totally against the Land Mobil Communications Council petition seeking access to the 420 - 430 MHz segment and the 440 - 450 MHz segment. Of major concern is the fact that the LMCC has not stated in any medium as to how they intend to "share" these segments with Amateur Radio. Amateur Radio is extremely concerned with this petition as a threat, to the loss of radio spectrum that we now utilize and enjoy.

The 70 cm band is the second most popular amateur VHF operating band at the present time. This band provides an alternative to the ever growing and crowded 2 meter band.

The 70 cm band also provides amateur radio with the ability to provide public service communications and also emergency communications during times of public need.

The 70 cm band provides for voice linked systems and packet systems.

I am personally affected by this petition as I am the owner of the KT4ER repeater located within one of the above requested segments. I estimate that I have invested well over \$2,500.00 to put the repeater system on the air and I am planning further improvements which I will provide for out of my own pocket. My repeater is open to all FCC licensed amateurs.

I have received authorization from the Prince William County Chapter of the American Red Cross to establish the KT4ER repeater to provide Red Cross communications during times of need or disaster for the Northern Virginia area. This entails emergency communications for the Red Cross when required or requested by the Red Cross. I am also a member of my local Red Cross Chapter's Disaster Action Team and directly benefit from this operating capability.

I would request that the petition be "denied" with regards to the above comments and what is in the best interests of Amateur Radio and the public we serve in times of need.

Sincerely yours,



Scott C. Bellefeuille

KT4ER

2170 Logmill Road.,

Haymarket, VA 20169

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May 21, 1998

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

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

To: The Secretary,  
Federal Communications Commission

STATEMENT OF OPPOSITION TO RE-9267

I am writing in opposition to the Land Mobile Communications Council's proposal to reallocate the 420-430 MHz and 440-450 MHz frequency spectrum to commercial, private, land mobile applications. Instead I ask that the Commission change the Amateur allocation from secondary to co-primary with the U.S. government. Prior to the Cold War era, the Amateur Radio Service was a primary status user of these frequencies.

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

Private and for-profit services do not have mutually compatible interests with the Amateur Radio Service. Sharing between private land mobile and the Amateur Radio Service, as proposed by the LMCC, will not work. The 420-450 band is the second most used VHF/UHF Amateur Radio allocation. The loss of these frequencies will cause severe disruption to the mission of Amateur Radio, as specified in C.F.R. Title 47 Part 97.1.

I respectfully request that you DENY the the request of the LMCC to share the Amateur radio allocations at 420-430 and 440-450 MHz. Instead I request that the Commission restore Amateur Radio's historic co-primary status in the entire band 420-450 MHz

Sincerely,

*Carroll Hines*  
1604 2nd St  
TOPA P.O. Box 22

*KFH VQCC*

*33559*

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Comment on file number  
RM-9267

MAY 23 1998

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,



John L. Smith  
Amateur Radio Station KD5YI  
1717 Laurel Lane  
Plano, TX 75074

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DOCKET FILE COPY ORIGINAL

Secretary of the  
Federal Communications Commission  
Room 222  
1919 M st. N.W.  
Washington DC 20554  
reference: RM9267

Dear Mr. Secretary:

I would like to go on record in opposition to RM9267. I am a licensed Ham operator in the Los Angeles area, and feel that a rule change such as this would be a tremendous detriment to the community and it's people. As a Ham radio operator, I have volunteered many hours of community service in training and developing Emergency Communications with our local city government. The Northridge earthquake and the Malibu fires were tests of our abilities to co-ordinate emergency response which were not capable by other means. Because of the terrain and the size of Los Angeles, many repeaters that Hams use on other frequencies are and must be linked using 420-430 Mhz and 440-450 Mhz frequencies. If these frequencies are no longer available for us to use, there is not enough room on other frequencies to serve as links, nor as repeaters to handle the communication needs of the community.

**Please remember that Hams have earned the privilege, and that as operators, we have been trained to communicate with others.** Others services may provide equipment, but they can not provide the desire shown by Hams in times of disaster, nor the training needed to communicate effectively.

I urge you as strongly as I can that this would be a very bad rule change and would not be in the best interest of the Federal, State and Local governments and citizens for which Hams are so willing to help.

Sincerely,  
Mark Kanzler, KE6ZRP

*Mark Kanzler*  
5-20-98

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*OET*

May 21, 1998

DOCKET FILE COPY ORIGINAL

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

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

To: The Secretary,  
Federal Communications Commission

STATEMENT OF OPPOSITION TO RE-9267

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

Private and for-profit services do not have mutually compatible interests with the Amateur Radio Service. Sharing between private land mobile and the Amateur Radio Service, as proposed by the LMCC, will not work. The 420-450 band is the second most used VHF/UHF Amateur Radio allocation. The loss of these frequencies will cause severe disruption to the mission of Amateur Radio, as specified in C.F.R. Title 47 Part 97.1.

I respectfully request that you DENY the the request of the LMCC to share the Amateur radio allocations at 420-430 and 440-450 MHz. Instead I request that the Commission restore Amateur Radio's historic co-primary status in the entire band 420-450 MHz

Sincerely,

*Richard W. McCoy*  
*W4ZPO*  
*215 HOOVER AVE NE*  
*LAKE PLACID FL 33852*

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DOCKET FILE COPY ORIGINAL

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

MAY 9 3 13 PM '88

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 amateur frequency spectrum and especially in the 420 Mhz. to 450 Mhz. range.

Sincerely,  
  
BILL J. SMITH  
KF6QVT

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AGCDE

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OCT



# Edison Radio Amateur's Association

Founded in 1940

2000 Second Ave., Detroit, Michigan 48226

50 Years Affiliation with the American Radio Relay League, Inc.

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

DOCKET FILE COPY ORIGINAL

RE: Formal comments on RM-9267.

The Edison Radio Amateur Association (ERAA) is an Amateur Radio club affiliated with the Detroit Edison Company in Detroit, MI. Among the many services we provide to our members and to the amateur community at large is a repeater in the 440 MHz amateur band. Because of this and other reasons set forth below we are writing in opposition to RM-9267.

RM-9267, a proposal for rulemaking before the Commission, has been filed by the Land Mobile Communications Council (LMCC). It seeks to have two-thirds of the 420-450 MHz Amateur Radio band reallocated to the Private Mobile Radio Service (PMRS).

The ERAA 440 MHz repeater is located within the portion of the band which RM-9267 seeks to reallocate. The loss of this repeater would deal a serious blow to the Amateur Radio community in the Detroit area. It would also hurt the Radio Amateur Civil Emergency Service (RACES) organization in Wayne County and many nonprofits who count on Amateur Radio for support.

The ERAA repeater is open to any licensed operator regardless of whether they are a club member. It provides a place to communicate with friends as well as a vital link to the police agencies throughout the area when needed. If an amateur's car breaks down, or is involved in an accident, the repeater is always available to quickly and easily connect them to help through its autopatch telephone system.

The ERAA also makes the repeater available when requested for public service events. These include MS Walkathons, the Detroit Free Press International Marathon, and several others each year. Where else can these groups turn to for voluntary, professional, and reliable communication assistance.

Most importantly, the ERAA repeater is an official RACES repeater. During emergencies it is used to link hams all around the area to government agencies who need their services. Most commonly this involves the National Weather Service. When severe weather hits, the repeater is used to convey the spotter reports from amateurs in the field to the National Weather Service office. You often hear weather watches and warnings being issued based on this information. During disasters like plane crashes at Detroit Metro Airport or tornado touchdowns the repeater is called into service to link mobile command posts in the field with the Wayne County Emergency Operations Center.

RM-9267 would leave the Amateur Radio Service secondary allocation in the 440 MHz band as it is, but reassign the primary allocation to the LMCC. Currently, the U.S. Military holds the primary allocation. The amateur and military uses of the band are quite compatible and sharing has not been a problem. However, the LMCC would utilize the band much more heavily and in ways that would render the secondary allocation virtually useless. Any amateur transmission, certainly those of powerful repeater systems, would cause harmful interference to the LMCC stations.

The LMCC simply doesn't understand the ramifications of their proposal. The 440 MHz band is used for emergency communications all across the country. It's not just done in Detroit. They claim sharing is possible, but give no explanation of how it is possible. They suggest possible new bands for amateur activity, but don't consider the amount of time and money invested in the current equipment through the voluntary, unsubsidized actions of the amateur community. In short, RM-9267 is a bad proposal for Amateur Radio and for every agency or organization which we serve. The Edison Radio Amateurs Association requests that you reject RM-9267.

Sincerely,

Brian Westphal, KB8QXA  
ERAA Secretary

No. of Copies rec'd 024  
LABODE 091

**Albert U. Fahnestock (Retired)**

1499 East Wilson Ave ~ Escondido, California. 92027-1942  
Fax (760) 741-5268 ~ Home Phone (760) 741-1840 ~ Email auf30@aol.com  
Amatuer Radio N6GNB, 2 Meter / Packet W6NWW

May 20, 1998

Secretary  
Federal Communications Commission  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Subject: RM9267

Gentlemen:

I wish to raise my objections to the Land Mobile Communications Council *demand* for reallocation of most of the 70 centimeter Amateur band over to private mobile operations with private land mobile designated as the primary user.

The 70-centimeter band is the second most used band in the Amateur Radio Service. Amateurs use this band for mountain top repeaters with some 900 such repeaters in the state of California alone. In addition this band is used for link control frequencies, satellite downlinks, Amateur Television input and output links. All of these frequencies are heavily used particularly in disaster communications.

The Land Mobile Communications Council has stated a willingness to permit Amateur Radio to retain some sort of secondary status but only on a non-interfering basis. How this could be accomplished defies logic when Amateurs use virtually all frequencies in the 70-centimeter band for the purposes stated above.

There, I raise my voice in opposition to the LMCC's proposal.

Sincerely,

  
ALBERT U. FAHNESTOCK

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FILE

OET

George K Watson  
K0IW  
91 Pine Glade Rd.  
Nederland, CO  
80466

MAY 20 1998

RECEIVED

May 20, 1998

MAY 20 1998

DOCKET FILE COPY ORIGINAL

RE: **RM-9267**

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

Dear Sir or Madam,

I am writing to comment on the Petition for Rulemaking **RM-9267**. I am thoroughly opposed to the reallocation of the 420Mhz-430Mhz/440Mhz-450Mhz segments as requested by the Private Mobile Radio Service. This segment of the radio spectrum is currently allocated to the Amateur Service on a secondary basis and is one of the most important segments within the Amateur Service. The loss of this segment would be seriously detrimental to the Amateur Service's ability to deliver critical communication services during times of local and regional emergency. It also would have an impact on the economic situation of many thousands of licensees of the Amateur Service who have invested in equipment for these frequencies in good faith. It would effect my operations and my personal safety as I live in a remote mountain community and depend on these frequencies for communication during local storms.

There are many hundreds of Races and Ares organizations that rely on these frequencies for providing emergency communications during local and regional emergencies. The reallocation of this spectrum as proposed under **RM-9267** would render these organization's plans and equipment useless forcing them to re-plan and re-acquire in a scramble that would leave gaps in the nation's emergency communications infrastructure for some time to come. The FCC is fully aware of the value of these services as proven during the recent weather based emergencies experienced in the Southeast.

Many amateur operators, myself included have purchased equipment for use on this portion of the spectrum in the good faith assumption that this portion of the spectrum would remain in the Amateur Service for the foreseeable future. I myself use these frequencies to ensure my safety and the safety of my family during the frequent winter storms that visit our area. As there is no cell-phone service in my area, these frequencies form a vital link for my family during local weather events.

In closing, I would like to comment that I believe that the Private Mobile Radio Service has legitimate spectrum needs and that these needs should be met. However, I also believe that there is spectrum available to the service which would not have the broad and far reaching detrimental effect that the proposed change does.

Sincerely,



George K. Watson  
K0IW

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FCC MAIL ROOM

MAY 28 1998

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

Dear Commission:

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

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

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

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

Sincerely,

*Eugene M. Smith* KE6AQF

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FEDERAL COMMUNICATIONS COMMISSION

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Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

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

To: The Secretary,  
Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

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

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

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

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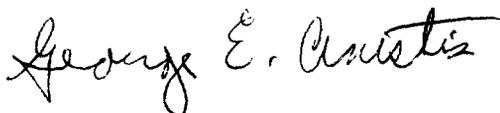
services; "sharing", as in the AVL example, will result in the loss of 420-430 and 440-450 MHz by the Amateur service, which will prove devastating to the mission of the Amateur Radio service.

Many government agencies and non-profit disaster relief organizations would be tremendously harmed by the loss of the Amateur 420-430 and 440-450 MHz allocations.

Private and for-profit radio services do not have mutually compatible interests with the Amateur Radio Service. Sharing between private land mobile and the Amateur Radio Service, as proposed by the LMCC, will not work. The 420-450 MHz band is the second most used VHF/UHF Amateur Radio allocation. The loss of these frequencies will cause severe disruption to the mission of Amateur Radio, as specified in C.F.R. Title 47 Part 97.1, and will render severe harm to the Amateur's ability to support numerous government and non-profit relief agencies.

I respectfully request that you DENY the request of the LMCC to share the Amateur radio allocations at 420-430 and 440-450 MHz. Instead, I request that the Commission restore Amateur Radio's historic co-primary status in the entire band 420-450 MHz.

Sincerely,

A handwritten signature in cursive script that reads "George E. Anestis". The signature is written in black ink and is positioned above the typed name and address.

George E. Anestis, W3ANX  
737 Jackson Drive  
Apollo, PA 15613

May 22, 1998

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MAY 28 1993

FOO

K7VP

Virgil E. Pattin  
3260 E. Alvord Rd.  
Tucson, AZ 85706-4611  
(520) 294 9599

DOCKET FILE COPY ORIGINAL

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

Dear Sirs:

It is my belief that reallocating the 70-cm band to LMCC would be most hurtful. Not only to me, but to the amateur community in general. For me, I use the band for public service, and for emergency communications during any disaster that chooses to come my way, and there have been some. I am also involved with the use of the linked services on 2 meters. I use this system to help travelers with information and, the loss of these linked system would be a great loss.

Increasing interest in the other modes has been something I have been aware of but have not pressed. This fact I believe I share with others, in that; when new modes of operation are researched and trials needed, there would be less spectrum to use, and this would eliminate the experimenter from a field of endeavor that in the past has been so productive.

The amateur community has lost some 100+Mhz of spectrum in the past, and this loss must better thought out. So as the time for decision approaches, think just who will benefit and who will loose, and whether or not there are things worth more than money.

Truly yours,

*Virgil E. Pattin K7VP*  
Virgil E. Pattin K7VP

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20 May 1998

DOCKET FILE COPY ORIGINAL

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

To Whom It May Concern,

I am writing to you in opposition to RM-9267, the Land Mobile Communications Council's attempt to access the amateur 70 cm band. Even though amateur use is secondary to the military, the loss of these frequencies to amateurs would cause serious disruption to emergency communications efforts in our area.

I am the owner of an FM repeater on this band that is dedicated to assisting the communications needs of the local American Red Cross chapter during disasters. My repeater system has a frequency agile remote base for the amateur two meter band, which makes it a pivotal link during emergencies. It is located on one of the highest locations in Jefferson County, Kentucky and has emergency power and telephone interconnect capabilities as well.

This repeater has been on the air continuously since 1984, except for a one day outage due to a direct lightning hit. It is one of the most used repeaters on this band in the Louisville area. It would be devastating for this system to leave the air due to this proposed reassignment of spectrum.

Sincerely,

*Vernon C. Nunn*  
Vernon C. Nunn

N4UL  
P O Box 4804  
Louisville, Kentucky 40204-0804

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May 22, 1998

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**COMMENTS ON RM-9267**

James C. Mayer  
KB9SIF  
S69 W14833 Dartmouth Cir.  
Muskego, WI 53150-8695

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

Dear sirs;

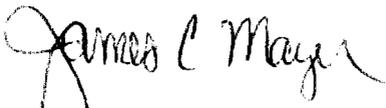
I am a licensed amateur radio operator from the Milwaukee area. I am writing in response to RM-9267, proposed reallocation of the 420-430 and 440-450 MHz from amateur to Private Mobile Radio Service use.

The reallocation of this frequency band to PMRS use would force the shutdown of vitally important public-service communication infrastructure in our region. Several mobile relay stations (repeaters) are linked for wide-area communications using these frequencies. These systems are continually used for vital applications such as severe weather spotter coordination to the National Weather Service, calls for highway emergency assistance using telephone autopatch, backup to State and Municipal communication methods during disaster or widespread emergencies and providing area-wide communication for the safe coordination of special events.

In addition to lost bandwidth, the amateur radio emergency communication systems will suffer from crowding and interference from adjacent PMRS frequencies, even more so than currently.

I urge that this proposed rule making 9267 not be passed. It will drastically affect thousands of amateur radio public service communication systems, most of which are operated by individual amateur radio operators concerned about their community's well being.

Sincerely,



James C. Mayer

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Before the  
FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of )  
 )  
An Allocation of Spectrum for )  
Private Mobile Radio Services ) RM-9267  
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To: The Secretary,  
Federal Communications Commission

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