

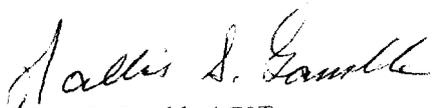
services; "sharing", as in the AVL example, will result in the loss of 420-430 and 440-450 MHz by the Amateur service, which will prove devastating to the mission of the Amateur Radio service.

- 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,



Wallis S. Gamble AC0T  
11068 W. 31<sup>st</sup>. Ave.  
Lakewood, CO 80215

May 18, 1998

RECEIVED

MAY 28 1992

DOCKET FILE COPY ORIGINAL

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

FCC MAIL ROOM

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,

*G. Salamone*

NE6ZRD

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RECEIVED

MAY 28 1998

FCC MAIL ROOM

DOCKET FILE COPY ORIGINAL

Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

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

To: The Secretary,  
Federal Communications Commission

STATEMENT OF OPPOSITION TO RM-9267

I am writing in opposition to the Land Mobile Communications Council's proposal to re-allocate the 420-430 MHz and 440-450 MHz frequency spectrum to commercial, private, land mobile applications. Instead, I ask that the Commission change the Amateur allocation from secondary to co-primary with the U.S. government. 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.

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

- Many government agencies and non-profit disaster relief organizations would be tremendously harmed by the loss of the Amateur 420-430 and 440-450 MHz allocations.
- The 420-450MHz band is widely used for "back-bone" linking of Amateur Radio packet networks, which are valuable assets for emergency communications.

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,



Richard W. Le Massena Jr., W6KH  
131 Old Adobe Rd  
Los Gatos, Ca 95032-1624

May 19, 1998

DOCKET FILE COPY ORIGINAL

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.

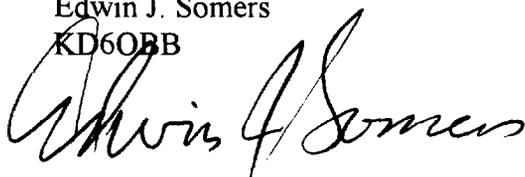
I am active on many Amateur Radio frequencies that promote public welfare through emergency, disaster and public service communication. The frequencies stated in RM-9267 (420 MHz to 430 MHz and 440 MHz to 450 MHz), are very important to our continued success in serving the public and our communities 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,

Edwin J. Somers  
KD6QBB



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4

ABODE

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RECEIVED  
MAY 20 1998  
FEDERAL COMMUNICATIONS COMMISSION

DOCKET FILE COPY ORIGINAL

Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
**WASHINGTON, DC 20554**

In the Matter of )  
The Land Mobile Communications Council's (LMCC) )  
PETITION FOR RULEMAKING ) RM-9267  
Request for the Immediate Reallocation of )  
420 to 430 MHz. and 440 to 450 MHz. )  
From the Federal Government to the )  
Private Mobile Radio Service (PMRS) on a Primary Basis. )

To: The Chief, Public Safety and Private Wireless Division  
Wireless Telecommunications Bureau

**OBJECTION TO**  
**REQUEST FOR FREQUENCY REALLOCATION**  
**420 to 430 MHz. and 440 to 450 MHz.**

Gregory S. Miller (WA4LEF)  
6715 Queen Annes Drive  
Raleigh, NC 27613

May 19, 1998

No. of Copies rec'd 5  
L ABCDE OWT

Dear Commissioners:

I am writing this letter to respectfully request that you deny the LMCC's request for reallocation of the 420 to 430 MHz. and 440 to 450 MHz. from the federal government to the Private Mobile Radio Service (PMRS) on a primary basis. Amateur Radio now enjoys the use of 420 to 450 MHz on a secondary basis, and the 430 to 440 MHz segment is an international allocation.

I have been a licensed Amateur Radio operator off and on for approximately 24 years.

The 70-cm band is the second most popular VHF/UHF Amateur Radio band. It has substantial FM repeater, Packet radio, and radio control link operations in the 440 to 450 MHz segment.

This band is **absolutely essential** for FM repeater operations which are heavily used for emergency communications and public service operations, especially ARES and SkyWarn operations.

Thousands of U.S. Amateur Radio operators have made a significant personal financial investment in equipment for the 70cm band and also provide major contributions of their time in the support of ARES and SkyWarn as well as other public service operations. These activities would be severely crippled if Amateur Radio lost its use of these frequencies.

The 70 cm band is the lowest Amateur frequency that high speed packet radio and ATV are permitted. Due to bandwidth limitations, these types of communications would only be possible on the microwave bands if Amateurs were to lose the 70cm band. Due to propagation conditions and path loss considerations at microwave frequencies these modes of operation would be severely impacted.

The 420 to 430 MHz segment is heavily used for Amateur Television (ATV) repeaters. It is the only allocation below 900 MHz. for this mode of operation. It would be impossible to share these frequencies with the LMRS.

In my area there is an organization called the Triangle ATV Association. They own and operate an ATV repeater in Durham, NC which has its output on 421.25 MHz. They have more than \$5,000 and 5 years of time invested in this system. Compared to commercial and government communications systems, \$5,000 probably seems very small to you, but I can assure you that it is very significant to Amateur Radio operators when you are speaking about a personal

investment. They are in the process of raising an additional \$5,000 so that They can add a second linked system to be located in Raleigh, NC to provide enhanced ATV coverage for this area. Reallocation of the 420 to 430 MHz segment would destroy their investment in this system. This would impose a severe penalty on all ATV operators across the country.

The 70cm ATV frequencies provide for the easy and inexpensive introduction of ATV to Amateur Radio operators, and non-licensed experimenters as well, because of the ability to use "Cable Ready" TV sets and VCRs for ATV receivers since the ATV channels of 421.25 and 428.25 MHz. correspond to Cable channels 57 and 58. If the 420 to 430 MHz segment is lost, it would severely impact many Amateur Radio operators who have invested significant money and time in ATV. It would put ATV operation out of reach to many people who could not afford the much more expensive equipment required for operation at 903 MHz and above.

The LMCC has acknowledged Amateur Radio's value and record of service. Rather than proposing total elimination of Amateur Radio in the selected spectrum, they propose sharing the band, with Amateur Radio taking a secondary, non-interfering position. However, they make no suggestions as to how this arrangement might work.

The suggestion that Amateur Radio and the PMRC could share the 70cm band is completely unworkable, and the LMCC's offer to share spectrum should not tip the balance of this request in their favor.

Amateur Radio is currently secondary to the US Government in the 420-450 MHz band.

Here in the North Carolina, the government's principle use of the spectrum is for RADAR.

Amateur signals do not disrupt the RADAR operation at all, and while the RADAR signals do occasionally disrupt Amateur communications, the effect is minor and we have co-existed with very few problems for many years.

In the 440-450 MHz band, most Amateur communication, as well as most PMRC communication, would use the same mode: narrow band FM. In major metropolitan areas, each PMRC system placed on the air would surely displace an Amateur system. Thousands of Amateur 70cm repeaters across the country would be eliminated.

In the 420-430 MHz segment, Amateur Radio is primarily Amateur Fast Scan Television, and any PMRC signals appearing in that spectrum would make Amateur TV completely unusable. The LMCC suggests the possibility of making some spectrum available to Amateurs in the 1400 MHz area. While we appreciate the thought, it would be a very unfair trade. The LMCC points out that their own need for 450 MHz spectrum is based on immediate equipment availability. They say they could use existing equipment at 450 MHz, while hardware at 1400 MHz and above has not been developed to suit their needs.

Meanwhile, thousands of Amateurs would be left with useless UHF equipment that was purchased with personal funds. There is no equipment available to suit Amateur needs in the 1400 MHz area, either. The large PMRC market is much more likely to spur hardware development for those frequencies than the Amateur market could ever provide.

### **Conclusion:**

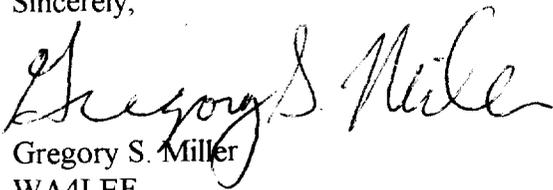
The LMCC has demanded the immediate reassignment of the 70cm band to them as primary users. This would impose a heavy financial burden on thousands of Amateur Radio operators and would cripple emergency and public service operations across the country. In addition, it would seriously impact the growth of Amateur radio.

Please consider the track record of Amateur Radio's contribution to emergency communications across the country during the many tornadoes, floods, hurricanes, and other disasters that our country has experienced during the past many years. Future emergency communications operations would be crippled if the LMCC's demands for the 70cm band are granted.

Therefore, I respectfully urge the Commission to deny the LMCC's request to reallocate the Government/Amateur Radio spectrum between 420-450 MHz.

Thank you for considering my comments in making your decision. I would like to further request that you consider making Amateur Radio the Primary and sole user for any and all portions of the 70cm Amateur Radio band, if and when such portions are abandoned by the U.S. Government.

Sincerely,

A handwritten signature in cursive script that reads "Gregory S. Miller". The signature is written in black ink and is positioned above the printed name and call sign.

Gregory S. Miller  
WA4LEF

5/17/98

DOCKET FILE COPY ORIGINAL

Craig R. Knedler  
5325 Kalaniana'ole Hwy  
Honolulu, HI 96821

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

Re: Land Mobile Communications Council, Petition RM 9267

Dear Sir:

I have learned that on April 22, 1998, the Land Mobile Communications Council (LMCC) filed a petition with the Federal Communications Commission (FCC), designated RM-9267, which seeks to immediately reallocate the radio frequency bands 420-430 Mhz, paired with 440-450 Mhz for the use of the Private Mobile Radio Service (PMRS).

These frequency bands are heavily used by Radio Amateurs operating in the Amateur Radio Service. For example, Radio Amateurs use these frequency bands to provide emergency communications in local emergencies and widespread natural disasters. Other services provided by Radio Amateurs include public service and public interest communications for a variety of public events in cities, towns and communities across the nation throughout the year. And, Radio Amateurs provide these important services to the public FREE OF CHARGE.

In light of this, the frequency reallocation proposed by the LMCC is clearly incompatible with the Amateur Radio Service. It would have a negative impact on Radio Amateurs nationwide who have supported the public for many years with important communications services. Therefore, as a licensed Radio Amateur, I urge you NOT to consider reallocating the 420-450 Mhz radio frequency bands as outlined in RM-9267.

Sincerely,

Craig R. Knedler  
WH7R

No. of Copies rec'd

5

FCC DE

0 6/17/98

Hugh E. Haven  
164 Stanford Lane  
Seal Beach, CA 90740

May 18, 1998

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

DOCKET FILE COPY ORIGINAL

Re: RM-9267

Sir or Madam,

The Seal Beach and Los Alamitos Radio Amateur Civil Emergency Service (RACES), of which I am a member, has recently changed its emergency operating frequency to the 70 cm band (420 to 450 Mhz). We had been using a repeater in the 2 meter band which has become crowded. The change enables us to use a repeater in the 440 mHz region, a less crowded part of this band.

All forty-five members of the group bought transceivers, antennas and other equipment needed to participate in RACES training and emergency operations. This is a considerable cost to our members who are all volunteers and must provide their own equipment with their own money. The repeater, an automatic receiver/transmitter, belongs to one of our members.

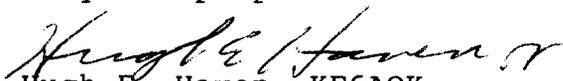
Our RACES group is one of the many such disaster or emergency service groups in this area and throughout the United States which use the 70 cm band. We communicate on this band directly with one another or use repeaters to extend the range of communication from handheld transceivers. We provide effective assistance to police and fire departments; who rely on our presence for backup and occasionally primary communication during civil emergencies, earthquakes, tornados and other disasters.

Of the 600,000 amateurs in this country, a majority of them participate in RACES or similar emergency service volunteer groups and own equipment to operate in the 70 cm band. The personal investment of amateurs in equipment to serve their communities using the 70 cm band is immense.

Loss of this band for amateur emergency volunteers would force them to seek frequencies in other crowded bands and buy new equipment to use with the new band. Many could not afford this.

It is not in the interest of the citizens of the United States to deny operation privileges for the 70 cm band to amateurs in favor of commercial operators as is demanded in the Land Mobile Communications Council proposal RM-9267.

For these reasons I respectfully request that the Commission deny the proposal RM-9267.

  
Hugh E. Haven, KF6AOK

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OT

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,

David Bellenger - K06TD

*David Bellenger*

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May 22, 1998

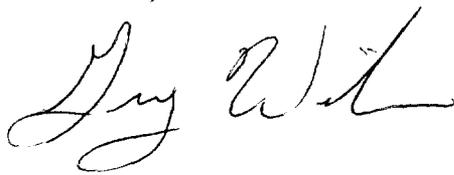
Office of the Secretary,  
Federal Communications Commission,  
Room 222,  
1919 M Street NW,  
Washington, DC 20554.

**Re: Comment on RM-9267**

I would like to make a comment in support of maintaining the 420-430/440-450 MHz band for amateur radio usage, and protecting it from use by businesses. The VHF/UHF bands are home to the fastest growing segment of Ham radio, and I am a part of that segment. Usage of these frequencies is increasing rapidly with that growth. I personally use this area of spectrum through repeater links which permit the state wide passing of health and welfare information. With the mountainous terrain in our area, Ham radio contact through these links is often the only way of staying in touch when my boys are camping in the mountain valleys. These links are often used in emergency situations, helping injured campers, hunters, etc., who are in areas where there is no telephone connection of any kind available. I also use these frequencies for direct contact of other amateur operators. In my area, these frequencies are used by amateur operators to provide the local law enforcement officials with real time television coverage of large crowd events, for crowd control. This public service usage has become very important for effective crowd control by the police.

Loss of these frequencies would make communications more difficult, and reduce the amateur service's ability to provide vital public service in our local community.

Greg Wilson  
2873 Ridge Drive  
Broomfield, CO 80020-1060

  
KCØADT

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DOCKET FILE COPY ORIGINAL

May 22, 1998

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

\*\*\*Re: RM 9267 \*\*\*

Dear Sirs:

My wife and I, as licenced Amateur Radio Operators, oppose **RM 9267** because of the potential loss of various interstate communication links in which we provide emergency communication as well as personal communications.

We must stop selling these radio frequencies to the highest bidders.

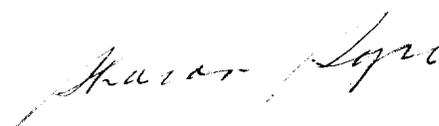
This bill would move these links into the already crowded portion of the 420 - 450 MHZ 70 centimeter band.

This frequency reallocation could be one of the many pieces of legislation in which radio frequency bands are sold for industrial profit and lost as a means of Amateur Radio Operator communication and for emergency service.

Sincerely,



Dominick Sgro - KF0YP



Sharon Sgro - KC7UTM

Dominick Sgro  
Sharon Sgro  
681 Papoose Dr.  
Lake Havasu City, AZ 86406

No. of Copies rec'd 5

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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

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.

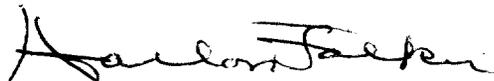
Many government agencies and non-profit disaster relief organizations would be tremendously harmed by the loss of the Amateur 420-430 and 440-450 MHz allocations. The following is a partial list of agencies that I have assisted with providing emergency communications via Amateur Radio using the 420-450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

- Shoreline Fire Department, Shoreline, Washington
- King County Fire Zone 1, Washington State
- Shoreline ACS, Shoreline, Washington

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,



Harlan Falkin, WB7OWF  
17203 14<sup>th</sup> Avenue N.W.  
Shoreline, Washington 98177

May 19, 1998

May 21, 1998

RM-9267

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

DOCKET FILE COPY ORIGINAL

Subject RM-9267 in Opposition by Amateur Radio W3STA

From: Jerome M Krim

I would like to express my opposition to giving most of our 70cm band to Land Mobile commercial interests. I'm sure I speak for the majority of dedicated licensed amateur radio operators who have over decades have unselfishly devoted thousands of hours to provide important radio communications during all kind of emergencies including hurricanes, tornadoes, fires and other disasters.

In my case, I have been involved as a volunteer using my own equipment paid for out of my personal funds since late 1949. Currently I am a volunteer with Chester County PA ARES RACES and have participated in a number of emergency drills particularly dealing with the close proximity of two nuclear power stations, Limerick and Peach Bottom. I own and help provide important links using UHF and VHF radio as well as HF radiop communications.

As a member of Navy/Marine Corp MARS I also provide health and welfare communications to those in the service aboard ship and overseas bases as well as emergency communications. Again, at my own time and expense of equipment. Our official moto is: PROUDLY SERVICING THOSE WHO SERVE.

My point is that if the FCC allows the whittling away of our amateur bands to commercial interests, eventually it will discourage these dedicated amateur radio operators and result in the loss of their proven valuable services.

Please allow our bands to stay intact.

Sincerely,



Jerome M Krim  
800 S Washington St.  
Kennett Square, PA

No. of Copies rec'd

ABODE

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OBT

Bruce Miller [REDACTED]

Box 31134 [REDACTED]

Seattle, WA 98103 [REDACTED]

WordPerfect and Editorial Consultant  
<http://www.eskimo.com/~brucem>

Member, American Society of Journalists and Authors  
<http://www.asja.org>

Contributing Editor, *Puget Sound Computer User* magazine  
Contributor, Newsbytes, division of Post-Newsweek Business Information Inc.

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**Public Information Coordinator**  
**Western Washington Section, American Radio Relay League**

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May 23, 1998

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

DOCKET FILE COPY ORIGINAL

**RE: RM-9267 comments**

Dear Secretary:

I oppose RM-9267, which would grant the Land Mobile Services the use of frequencies in 420-450 MHz currently assigned to Amateur Radio. The Land Mobile Communications Council (LMCC) proposal is incompatible with continued Amateur Radio use of the band. It will directly and drastically interfere with the emergency communication mission of Amateur Radio.

The first principal listed in Part 97, as a fundamental purpose of Amateur Radio, is recognition and enhancement of the value of the amateur service to the public as a voluntary noncommercial communication service, particularly in respect to emergency communications. Over the years the Amateur Radio community has upheld that principal by:

- \* Building and dedicating repeater systems to emergency communications
- \* Obtaining personal equipment that is compatible with the repeater systems
- \* Preparing, organizing and training for disasters
- \* Entering into agreements with numerous government agencies and disaster organizations to provide primary and supplemental communications when needed

All of this has been done with the donation of personal funds, time and effort.

Many of these supporting communications systems use repeater and link frequencies in the 420-450 MHz. range. The cost of replacing these systems somewhere else in the frequency spectrum would be so expensive as to destroy the emergency communication infrastructure that amateur radio operators have worked hard to build.

I am the Public Information Coordinator for the Western Washington Section of the American Radio Relay League. In my broad capacity, I work with a variety of groups to develop emergency communications that depend on the 420-450 MHz frequencies. These groups include Amateur Radio Emergency Services (ARES), city governments, non-profit groups, and school districts. Every plan that I have examined depends on established systems that use

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the 420-450 MHz. portion of the frequency spectrum, especially at the local level. The loss of this capability will destroy our ability to respond to the needs of the community.

Many say that Amateur Radio has several other frequency bands in the VHF and UHF range. True, however, 420-450 MHz. is the second most popular of these bands and therefore has a large existing equipment base immediately available for emergency communications. Additionally, Emergency Operations Centers (EOC) and other emergency communication hubs have the need to operate multiple frequencies simultaneously. Taking away the 420-450 MHz frequencies will create a hostile communications environment. The easiest and least expensive way to overcome the interference issues is to employ frequency diversification.

In Seattle, for example, the loss of the ability to operate between 420-450 MHz. would eliminate the two Seattle-EOC sponsored UHF repeaters for emergency use and the necessary simplex frequencies.

PLEASE NOT GRANT the Land Mobile Service access to 420-450 MHz. and deny us the use of this important emergency management resource.

Sincerely,

Sincerely,

*Bruce Miller*

2362 Manchester Avenue  
Cardiff by the Sea, CA 92007

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

May 18, 1998

**RE: RM-9267**

Dear Secretary:

I am writing regarding proposed rule RM-9267 which would reallocate designated use of the 420-450 MHz radio band. I am OPPOSED to the proposed reallocation of this band.

As an amateur radio operator, the 420-450 MHz band is a very important band width for amateur radio. I frequently use this band for simplex radio communications. When simplex is not feasible, I utilize one of the many radio repeaters which utilizes input and output frequencies within this band width. This band is also utilized for linking repeaters.

This frequency band is also important for public safety and disaster amateur radio communications. The 440 band offers several advantages over several of the amateur bands for example for emergency traffic within buildings such as during hospital emergency disaster conditions.

I respectfully request the 420-450 MHz band not be reallocated from the current designated authorized uses and would appreciate your consideration of my opinion on this matter.

Respectfully submitted,

  
Stephen Ruesch  
KE6CWP

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DOCKET FILE COPY ORIGINAL

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

RE: RM 9267

Dear Sir,

My amateur radio call sign is KE6NXY and I am writing to urge you to reject the "demand" for reallocation of 70 centimeter spectrum to private commercial use.

While no amateur likes to lose any of the spectrum currently available to us, we have a particular reason for objecting to this commercial demand. Many of us are members of volunteer organizations such as ARES and regularly respond to requests for communication assistance in times of local disaster. In such cases, we set up radio communications between the scene of the disaster and local area hospitals which have agreed to receive and treat the victims of such disasters. When we first started doing this several years ago, the frequencies of choice were in the two meter band. Recently, however, we have found that two meter transmissions can cause interference with some of the instrumentation in Intensive Care Units while 440 MHz frequencies do not. Area hospitals have therefore requested that we use the 70 centimeter band for all transmissions within and in close proximity to the hospitals themselves.

Obviously our ability to support this request will be seriously damaged if RM 9267 is approved and I therefore respectfully request that you deny this request.

Sincerely,

*Tom Lambert*

Tom Lambert KE6NXY  
P.O. Box 9315  
San Diego, Ca. 92169-0315  
619-270-1950

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

Sincerely,

  
JIM LUDLOW  
KJ7NT

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RM-9267

May 20, 1998

Secretary FCC  
1919 M ST. NW  
Washington, D.C.  
20554

DOCKET FILE COPY ORIGINAL

Dear Sir:

I was shocked to hear that the LMCC wants to take our 70cm band. When I hear names like "American Petroleum Inst." it flies in the face of the LMCC being not for profit.

Why do they think that big business needs to expand at the same time that they would condemn Amateur Radio to shrivel and die? Can corporate America not understand that life liberty and the pursuit of happiness are about more things than just wealth? Can there not be room in this world for Ham Radio, recreation, hobbies, and parks?

Ham Radio is still paying dividends by providing communications in times of disaster in ways that the LMCC members could not. We are still innovating see my article in the May 1998 QST magazine about a cheap, compact, rugged RF attenuator.

How could we possibly compensate the Hams for the millions of dollars worth of 70cm equipment that they bought believing that they had privileges on the 70cm band?

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Thank You

Pete Ostapchuk

P. T. Ostapchuk

RM-9267

May 20, 1998

Dear Mr. Secretary:

As an amateur radio operator licensed for over 40 years, I wish to strongly object to the reallocation of any or all of the 420-450 Mhz amateur band.

Amateur radio has for many years provided free emergency communications across the country during disasters. In many cases, all commercial communications fail and amateur communications are the only ones operational. Much of this is only possible through repeaters operating within the 440-450 Mhz band or through repeaters on other amateur bands linked or controlled in the 420-430 Mhz band. With the requirement that repeaters be controlled above 222 Mhz and the loss of the 220-222 Mhz band, the loss of any spectrum within the 420-450 Mhz band would destroy the ability of amateurs to provide emergency communications. The present secondary allocation to amateurs, with the military as the primary allocation has worked well as the military only operates radar in this band. The land mobile service would operate radios that would not be compatible with amateur radio uses.

With the increasing frequency of floods, hurricanes, earthquakes, and other natural disasters, the the amateur radio emergency communications capability becomes more and more valuable as a national asset at no cost to the public. Any reallocation of frequencies would also cause the amateur community to suffer great economic hardship. Amateurs have invested millions of dollars in setting up repeaters and in personal radio equipment to provide this free public service.

I strongly urge you to keep the amateur frequency allocations as they are and reject the demands of the land mobile companies.

Sincerely, *Lawrence Beilin*

Lawrence Beilin K6VDP  
Technical Committee Chairman  
Orange County Amateur Radio Club  
2952 Redwood Ave.  
Costa Mesa, CA. 92626