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MAY 21 1998
FCC MAIL ROOM

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Proposed Reallocation of 420)
To 430 MHz and 440 to 450 Mhz)
From the Federal Government to)
The Private Mobile Radio Service)

Gerald Rose, holder of an amateur radio license since 1985 submits the following in opposition to the above noted petition for rule making:

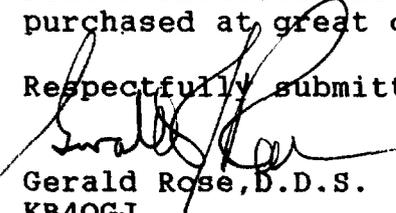
1) The priority position that the Land Mobile Communications Council (LMCC) wishes will prevent present radio amateurs in the 420 to 430 MHz band from effectively operating within these limitations.

2) The assumption by the LMCC that amateur television can be transferred to the 430-440 MHz band is not true since all U.S.T.V. bands (HDTV, EDTV, & SDTV) are based on 6MHz bandwidth. Amateurs also use 6MHz to a repeater and another 6 MHz on a rebroadcast.

3) Higher frequencies (above 450 MHz) have been found not to be practical because of attenuation due to trees.

4) The changing of these frequencies as proposed by LMCC would render obsolete the equipment and antennas that amateurs have purchased at great cost.

Respectfully submitted,


Gerald Rose, D.D.S.
KB4QGJ
524 North Quaker Lane
Alexandria, VA 22304-1827

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Alan Jackson KB5-ATE

RR 2 BOX 178
HENRIETTA TX 76365-9677
Home Phone 940-476-2676

May 18, 1998

DOCKET FILE COPY ORIGINAL

The Secretary
Federal Communications Commission
1919 M. St. NW
Washington, DC. 20544

I am writing in opposition to Land Mobile Communications Councils 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. With the tremendous success of the "No Code" Technician class license, and the enormous growth of Amateur Radio operators, Now is the time to restore Amateur Radios primary status within the 420-450 MHZ. band.

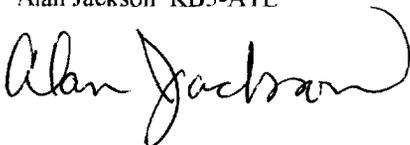
The 420-450 MHZ. band is the most used VHF/UHF band. The LMCC has requested sharing this band with Amateur operations, yet provide no explanation for how sharing might work. Based on history of "SHARING" with commercial services (particularly the example of AVL companies sharing the 902-928 MHZ. band, which ordered Amateur Radio Operators off the Air). "SHARING" means that Amateur Operators will be evicted from the band! This is what happens when commercial, FOR PROFIT services, share with NON-PROFIT organizations such as the Amateur Radio Services, whose service to the Public in times of disaster or need has been there countless times at no cost to the government. Amateur Radio has and will continue its VHF/UHF allocations with mutually compatible services and operations. These include the US Government, the US Military, NOAA wind shear Doppler radar, and other Government radiolocation services. Amateur Radio has had and will continue to have a long history of supporting US Armed Forces, NOAA through the National Weather Services Skywarn system. For these reasons, there is a mutual interest in sharing between compatible services like Amateur Radio and US Government, However there is NO interest in sharing with FOR PROFIT organizations, which will lead to the loss of the 420-430 and 440-450 MHZ band by the Amateur Radio Service, which will prove devastating to the mission of the Amateur Radio Service.

Local Amateur Radio operators are active and are very proud of their role in assistance to National Weather Service through the NOAA Skywarn program. This support of Local, City, County, Governmental Agencies, Red Cross, Fire Departments, and other agencies are supported FREE of charge. Private and FOR PROFIT services DO NOT have mutual interests which are compatible with the Amateur Radio Service. Therefore the proposed SHARING of the bands in question WILL NOT work. The loss of these frequencies, (420-450 MHZ) which are the second most used by the Amateur community will cause SEVERE disruption to Amateur Radios mission as specified C.F.R. Title 47 Part 97.1. And will render SEVERE harm to the Amateur Radio Services support to numerous Government and NON-PROFIT Relief Agencies.

I RESPECTFULLY REQUEST THAT YOU DENY THE LMCC,s REQUEST TO SHARE THE AMATEUR RADIO ALLOCATIONS OF THE 420-430 AND 440-450 MHZ. BAND. INSTEAD I REQUEST THAT THE COMMISSION RESTORE AMATEUR RADIO TO A HISTORIC CO-PRIMARY STATUS IN THE ENTIRE 420-450 MHZ. BAND.

Sincerely,

Alan Jackson KB5-ATE



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MAY 28 1998

FCC MAIL ROOM

Robert H. Scheller
13349 E. 50th Street
Yuma, AZ. 85367
May 18, 1998

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

Gentlemen,

I wish to express my opposition to the Petition for Rulemaking RM 9267.

In this petition, the Land Mobil Communications Council, LMCC, demands immediate allotment of the 420 - 430 MHz and 440 - 450 MHz bands for their purposes. Their proposal would allow the Amateur Radio Service to use these frequencies on a secondary, not to interfere basis.

In Yuma, Arizona the 420 - 450 MHz spectrum is fully utilized by the Amateur Radio Services, primarily as repeater links and voice repeaters. We recently attempted to obtain another frequency authorization for a repeater link and were told by the frequency coordinator that none were available. From this condition it appears unlikely that essential traffic can be shared on a secondary basis.

The repeater links in this band are relied on 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 such an active RACES/ARES program.

Yuma is located approximately 186 miles from both San Diego, CA and Phoenix AZ. We are 60 miles east of the San Andreas Fault. Much of the City is susceptible to flooding from the Colorado and Gila Rivers. Interstate 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 large quantities of explosive ordnance, and conduct a high volume of aircraft flights over the city while carrying ordnance. The City is also exposed to flooding and wind damage from the summer monsoon thunderstorms.

During hurricane Nora, which severely damaged Yuma last September, links in the 420 - 450 MHz band were utilized by the Red Cross mobile assistance team to maintain communications with their headquarters in Phoenix. These links were also utilized by Yuma County Emergency Operations Center to communicate with their counterparts in Phoenix during the emergency.

There has been a large investment, both on the part of individuals, and on the part of local government, through the RACES program, in amateur radio 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 vulnerable and isolated in times of emergency. I urge you to reject the LMCC's request for the primary allocations in 420 - 430 and 440 - 450 MHzs.

Sincerely,



Robert H. Scheller
Amateur Radio Licensee, KD6RAS

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MAY 28 1998

May 21, 1998

Pg 1 of 2

Secretary **FCC MAIL ROOM**

1919 M ST. NW

Washington, D. C. 20554

RE: RM9267

This letter is to inform you that I am opposed to the Land Mobile Communications Council being allocated any of the 70 centimeter band that is now allocated to Amateur Radio Operators.

Amateur Radio Operators provide emergency communication during disasters voluntarily. Our services are requested by many emergency services, such as 911, Red Cross, and even the National Guard. FEMA even recognizes the valuable resources amateurs have to offer.

Would Land Mobile Communications Council provide free services? Amateurs provide their time and service for free and even use their own equipment.

If the amateur bands are allocated to private industry, where will amateurs be? Clubs and individuals have paid hundreds and thousands of dollars for 70 centimeter equipment. How would they be compensated for this equipment that would become worthless?

Again, I oppose any allocation of amateur bands to any company or business. Think of it this way. Amateurs experimenting with

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FCC MAIL ROOM

Pg 2 of 2

REF: RM9267

the radio spectrum is what has started the information highway and for that reason our bands should be forever allocated to Amateurs. If it was not for amateurs there would be no faxes, cordless phones, cell phones or even the Internet. All of these things came about in one way or the other due to amateur radio.

I am supporting the bill introduced to the House of Representatives known as the "Amateur Radio Spectrum Protection Act of 1998," HR. 3572. I hope this bill passes and is signed, that may put an end to all of this once and for all!

Again, I oppose Land Mobile Communications Council being allocated any of the 70 centimeter band.

Thank you for your time.

Sincerely,

Judith D. Burgess, KC8CON
ARRL MEMBER ID 001788261

JUDITH D. BURGESS

Rt 3 Box 498A

FAYETTEVILLE, WV 25840

Supreme Radio Communications, Inc.

4017 NORTH PROSPECT ROAD

• PEORIA HEIGHTS, ILLINOIS 61614

• PHONE (309) 682-0831

DOCKET FILE COPY ORIGINAL

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

Subject: LMCC Petition for Rulemaking (RM-9267)

Dear Ms. Salas,

We at Supreme Radio Communications, Inc. are filing in support of the Petition for Rule Making filed by the LMCC seeking new spectrum allocations for private wireless users. We thank you for quickly placing the petition on public notice.

As a two-way radio user and dealer, we are very interested in these proceedings. We use two-way radio in our own business to dispatch service personnel and to coordinate business activities as do most of our customers. Our customer base includes farmers, small and large business, small and large manufacturers as well as government organizations. All are dependent upon two-way radio communications for safety and efficiency in their operations. Most have specific coverage and operational needs that cannot effectively be met by Cellular or PCS systems.

Trying to fit the needs of all radio users into the molds of Cellular and PCS type systems is not possible. Some farmers reside in areas in which it is not economically feasible to build cellular or PCS systems. These farmers would be unserved even if they could afford the monthly charges. Some businesses, hospitals and manufacturers have specific coverage needs that are not and will not be covered by the cellular or PCS systems. For example, tunnel or in building areas that the cellular or PCS companies would not bother to cover or geographic area needs that would be only partly covered by Cellular or PCS. These businesses and hospitals would have their communications needs unmet if they could not get a private system to meet their specific needs.

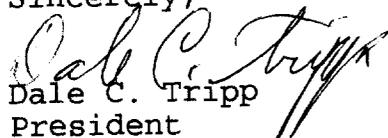
Supreme Radio Communications has been in business almost forty years and employs over thirty people. Our business was built upon serving the radio needs of our private radio customers. Our continued survival and growth is to a large part dependent upon our customers being able to get private radio systems to meet their unique needs. This is a very important issue.

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We at Supreme Radio Communications, Inc. would appreciate any efforts by the FCC to settle this issue quickly as spectrum for our customers is urgently needed.

Sincerely,



Dale C. Tripp
President

Supreme Radio Communications, Inc.

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MAY 28 1993

DOCKET FILE COPY ORIGINAL

Federal Communications Commission
Secretary of the FCC, Room 222
1919 M Street, N.W.
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 the United States.

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 the United States can continue to be a vital communications resource to the public during emergencies and disasters if RM-9267 is not approved.

Sincerely,

Wm E. Gell
WB2V FH

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DOCKET FILE COPY ORIGINAL

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

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MAY 14, 1998

FCC MAIL ROOM

The following are my comments to the proposed RM-9267 presented to the FCC by LMCC;

The Amateur Radio from 420 to 450 Mhz is used for Public Safety, Backbone to Amateur Radio SKYWARN advisory networks, Basic Repeater Systems and link controls for other repeater systems.

I am control operator for the KE2LS repeater operating on 442.7 /447.7 Mhz in the Adirondack Mountains of New York. This is one of the few repeaters within the actual High Peak Mountains. This repeater has been used during search and rescue missions for lost and injured hikers. Telephones are not common place in the mountains. In fact there are many exits on Interstate 87 in the High Peak region that have no facilities at some exits (NO PHONES). There are no Celular Telephone service in the High Peak region due to the mountains and state restrictions on towers on the high peaks which are state owned. This repeater has been used to report auto accidents, sick people and drunk drivers. Without this repeater, much delay would have taken place to find a telephone at some great distances. There a couple other repeaters in the high peak region that cover their respective areas. Complete coverage by one repeater is not possible due to the high mountains and deep valleys.

Due to this extreem mountainous region, it has become a very popular place for hiking and back packing within the 8 million acres. Amateur Radio operators hiking with portable radios are the only means to get help for injured people. Without radios, it could easily be a 8 to 10 hike to get to a telephone.

If these repeaters are not allowed to continue operation due to RM-9267, Public Safety will be GREATLY reduced. These repeaters are provided for all licensed Amateur Operators. Operation of these repeaters on a shared time basis (only on during certain periods) will not work for the life safety of the public who we serve. They must be available 24 hours a day for life safety.

Thank You for your sincer consideration in retention of these frequencies for Amateur Radio use.

Tammy Mierop KB2YBT
P.O. Box 22
Schroon Lake, NY 12870

Tammy Mierop

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CODE
087

Walter Carnegie KD6RLH
3637 2nd Ave.
Los Angeles, Ca. 90018-4363

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

5-21-98

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

Walter Carnegie KD6RLH

Walter Carnegie

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May 21, 1998

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 *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. Further, I strongly encourage you to ask the FCC to not only deny the *LMCC* proposal but to also request that the FCC re-establish Amateur Radio's historical co-primary status in the entire band from 420-450 MHz.

I currently hold amateur radio license KF6AZ and have been continuously licensed as an amateur radio operator for about 25 years. I have been operating in the 2-meter and 70-centimeter amateur bands for the past two years. The amateur radio club of which I am a member runs two repeaters on the 70-centimeter band, one of which hosts a phone patch. Once, I used the phone patch on that repeater to summon medical assistance for a person who had fallen ill from becoming overheated; it was great to have that resource available since no public phone was located nearby and nobody with a cell phone volunteered to make a call. Also, our repeater's phone line connects directly and in seconds to the county emergency center; anyone dialing 911 on a cell phone would get stuck on hold for many minutes due to being connected to the state police's overloaded emergency line.

I also use the 70-centimeter repeaters to keep in touch with fellow hams in "high-tech" industries, sharing knowledge and tips of mutual benefit

Sharing the 70-centimeter frequency band with private land mobile services would be disruptive and disadvantageous to the amateur radio service because of the incompatible goals of the two services.

I respectfully request that you **deny** the request of the *LMCC* as stated in RM-9267, to re-allocate the 420-430 and 440-450 MHz Amateur allocations to shared status with private land mobile. I instead request that you restore the historical Amateur co-primary status to these bands.

Sincerely, 

Bob McDonald
396 Hibiscus Way
San Rafael, CA 94903-2432
(415) 507-9529

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

In the Matter of)
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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 Councils 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 a sharing this band with Amateur operations yet provides no explanation for how sharing might occur. Based on the history of sharing with commercial services (particularly the example of AVL companies sharing 902-928 MHz who ordered hams off the air), sharing means that Amateur operations will be evicted from the band. This is what happens when commercial, for profit services share with not-for-profit, community service oriented Amateur Radio operations.

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

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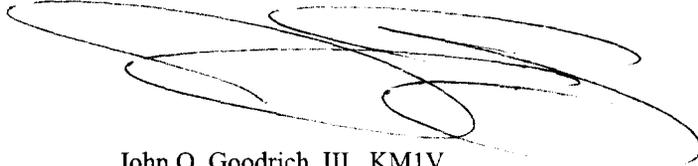
the Amateur service, which will prove devastating to the mission of the Amateur Radio service.

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 black ink, appearing to read "John Q. Goodrich, III", written over a large, faint, circular scribble.

John Q. Goodrich, III KM1V
4527 Maryland Ct.
San Diego, CA 92116

May 17, 1998

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 and the loss of this band would be a devastating blow to amateur radio operators. 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), "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 ham radio operators assist by providing emergency communications via Amateur Radio using the 420-450 MHz band:

- The United States Navy
- Countless sheriff's offices and police departments
- The United States Forest Service
- The United States Secret Service
- NOAA
- Nationwide Civil Defense and disaster relief organizations
- State Highway Patrol Departments, Police Departments, 9-1-1 call centers, etc.

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

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

Sincerely,



Christopher S. Ingham, KF4YIV
1124 Sousa Drive
Largo, FL 33771

May 19, 1998

DOCKET FILE COPY ORIGINAL

1039 Hunters Path
Lancaster, PA 17601-1744
May 25, 1998

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

Dear Secretary:

Reference is made to RM-9267

I am very concerned about the LMCC petition to the FCC for the reallocation of 420 to 430 MHz and 440 to 450 MHz from the federal government to the Private Mobile Radio Service.

From the day I built my first radio, a super-regenerative receiver, in 1936 to present, both my vocation and avocation has been radiocommunications. During my radiocommunications career, I witnessed the United States in the radio world grow from an average participant to the great leader that it is today. And as history has shown, the Amateur Radio Service was in the forefront

Although my radiocommunications vocation has come to a close, my radiocommunications avocation goes on. Presently my work is with the RACES service. Having had many years experience developing concepts for the military and systems for industry, I am the principal author of the Lancaster Emergency Management Agency's RACES plan and the system engineer for an on going project to develop a RACES field service van.

I can assure you that if the reallocation were to occur, the LEMA RACES emergency communications service would be devastated. The radio frequencies under consideration are our critical frequencies for passing imagery from a disaster site to the LEMA EOC. In my considered opinion the highest and best use of these frequencies is the Amateur Radio Service in support of emergency operations. Considering bandwidth and attenuation factors no other radio frequencies can provide real time imagery capability.

I, therefore, respectfully urge that the FCC consider the impact to the amateur radio community and its role in public service when making its decision.

Respectfully submitted,

Emanuel P. Peters
Emanuel P. Peters
KI6NJ

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DATE

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cc: Randall Gockley, Coordinator, Lancaster Emergency Management Agency.

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,


WB SAK

may 20 1998

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

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.

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

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

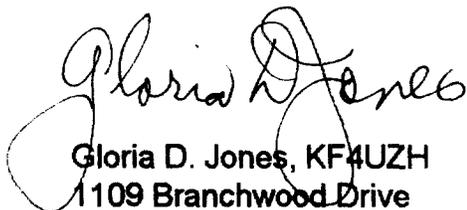
Examples of supported Agencies as : County Emergency Management, American Red Cross, Salvation Army, County Sheriffs Dept, Metropolitan Police & Fire Agencies in our County (Sanford, Lake Mary, Longwood, Casselberry, Altamonte Springs, Winter Springs, Oviedo, Geneva).

Although we, as individuals, do not actively work 70 cm Band for our Nets, these frequencies are used as administrative channels within and between adjacent counties.

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,


Gloria D. Jones, KF4UZH
1109 Branchwood Drive
Apopka, FL 32703

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

May 20, 1998

RE: 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 frequency bands 420 MHz to 430 MHz and 440 MHz to 450 MHz, proposed for reallocation by this petition, are very important to amateur radio's 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 by a large number of amateurs in Southern Arizona.

I have been licensed for 20 years, and I personally use many different frequencies within these sub bands EVERY DAY. Experimental communications; complex linking systems; remote control of transmitters and receivers operating on these and many other amateur bands; Public service exercises; and real disasters. As the **Radio Amateur Civil Emergency Services (RACES) Officer and District Emergency Coordinator** for Cochise County there would be a severe impact on the ability of our RACES/ARES organization to provide the public service support that we presently provide to Cochise County. These frequencies are an integral part of our county's emergency operations plan to provide support to the Sheriff's Office, Emergency Services Coordinator, Fire Chief's Association and other emergency services providers within the county.

Amateur Radio has proven to be a successful secondary user to the government radiolocation 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.

Commission approval of any PMRS (or similar) allocation on this or any amateur frequency band will effectively terminate any Amateur Radio operations within the specified band. Amateur Radio operations in Arizona which are a vital communications resource to the public during emergencies and disasters will be very badly damaged by the loss of 49 Percent of the available VHF amateur spectrum below 900 MHz.

I urge the Commission to **DENY** the above specified portions of RM-9267.

Sincerely,



Robert L. Hollister, N7INK
 Cochise County RACES Officer
 District Emergency Coordinator

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MOTOROLA
Pinnacle Club Dealer

May 26, 1998

REC-1231598
MAY 27 1998

Radio One, Inc.

6239 Edgewater Dr.
Ste N-1
Orlando, FL 32810
(407) 296-9488
(800) 771-9191
Fax (407) 578-9590

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

Rental Office

7031 Grand National Dr
Ste 108
Orlando, FL 32819
(407) 352-9242
Fax (407) 248-8654

RE: LMCC Petition for Rulemaking (RM-9267)

Dear Ms. Salas:

I **strongly support** this LMCC Petition for Rule Making. The quick action by the FCC seeking a public dialogue is commendable.

Florida Offices

TAMPA

6302 Benjamin Rd.
Ste 409
Tampa, FL 33634
(813) 881-9488
Pinellas (813) 449-9488
Fax (813) 885-1299

Our company provides private 2-way radio systems to a great variety of businesses in Florida. We have been in this business since 1990 and have over forty employees. Our customers depend on private 2-way radio systems to improve the productivity and safety of their operation.

A private 2-way radio system provides communications in a way that cellular phone type systems cannot. Our customers must have instant, fleet-wide contact to communicate effectively and economically. A private system can also be designed to provide the specific coverage required by the user, such as a farm, factory, or campus.

SARASOTA

2100 Constitution Blvd.
Ste 107
Sarasota, FL 34231
(941) 921-4611
Fax (941) 925-1398

We are not able to provide a private 2-way radio system to many of our customers because they cannot obtain a FCC license for a usable frequency. These customers are therefore denied the benefits of productivity and safety that the system would provide. Certainly, this is not in the public interest.

COCOA

2100 W. Highway 520
Cocoa, FL 32926
(407) 636-7004
Fax (407) 690-1847

The FCC should proceed as quickly as possible with this Petition. The growth here in Florida is making a bad situation worse. This new radio spectrum for private 2-way radio systems will greatly improve business productivity and safety. Thank you for your prompt attention to this matter.

Sincerely,

David MacDonald
President

DELRAY BEACH

2885 S. Congress Ave.
Ste C
Delray Beach, FL 33445
(561) 278-6455
Fax (561) 265-0878

DAVIE

3701 S.W. 47th Ave.
Ste 105
Davie, FL 33314
(954) 316-4523
Fax (954) 791-2074

MIAMI

10850 S.W. 113th Place
Ste 204
Miami, FL 33176
(305) 592-0977
Fax (305) 598-9360

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

Re: RM-9267

Dear Commission,

Please pay attention to the petition under consideration, RM-9267 and understand what taking frequencies away from the Amateur Radio bands would do to the public.

The frequencies in question are stated as: 420 MHZ to 430 MHZ and 440 MHZ to 450 MHZ. They are used as Military primary and Amateur Radio frequencies secondary. Land Mobile Radio wishes for these frequencies. They are busily used for public service, disaster communications preparations, experimentation in improving communications among technical hobbyists, and family and friend communications.

I have been a licensed Amateur Radio operator for almost four years, and believe that it has helped save my life (a gang was surrounding my car, and then left me alone when I picked up the mike), helped my son feel safe alone, encouraged him in his science endeavors (he has an almost full including room and board scholarship to Berkeley in physics), created my meeting with my beloved, encouraged community volunteering (recently helped radio communications for the Special Olympics), carried us through the Northridge earthquake (my son used his radio to find out how & where immediately, and we set up for emergency communications in our canyon), cut down on my phone bill, helped me get quick help with my stalled car on a freeway, and helped me meet a world of good service oriented Hams. -How's that for a run on sentence.

Please consider the consequences of RM-9267 and assigning primary frequency usage to Land Mobile Radio. Think back to the major help Hams have given in disasters with their own equipment (no cost to government) and think of the future for all the young hams coming up, looking for role models. I do not believe that you would knowingly let us loose any of our hard fought for frequencies.

Thank you very much,



Leah Shirokoff KE6MMU
11334 Santol Drive
Kagel Canyon, CA 91342

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NOV 28 1993
FEDERAL COMMUNICATIONS COMMISSION

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. I have been an amateur radio operator for the past 10 years and I operate primarily in the 420-4450 MHz band. I have witnessed firsthand 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:

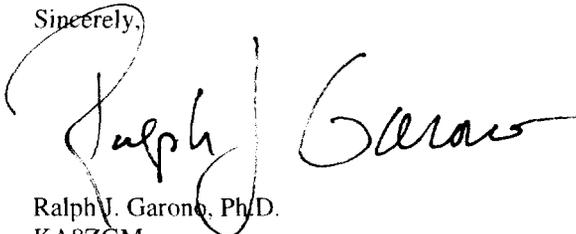
- Benton County (OR) Sheriff Dept. as a member of the Benton County (Oregon) Emergency Amateur Radio Service
- Oregon State University Amateur Radio Club
- The National Weather Service, Skywarn.

In addition, I have used my amateur radio to report crimes and to contact police for assistance at traffic accidents.

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,



Ralph V. Garono, Ph.D.
KA8ZGM
4400 NW Walnut, Apt. #32
Corvallis, OR 97330

May 17, 1998

DOCKET FILE COPY ORIGINAL

Gary G. Openshaw, KC7AWU
861 Roosevelt Avenue
Salt Lake City, Utah 84105

May 20, 1998

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

To Whom It May Concern:

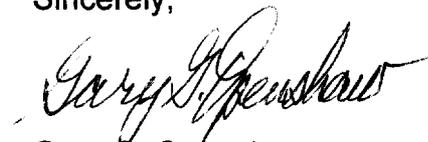
This letter is in reference to the proposed rule making of RM-9267 by the Land Mobile Communications Council seeking access to 70 cm band and the reallocation of 420 MHz to 430 MHz and 440 MHz to 450 MHz.

This reallocation would jeopardize the Amateur Radio service. Especially emergency communication in case of a disaster and there was no other way to communicate. I am sure the Land Mobile Communications Council would like to use it then also. The clubs that have repeaters on this band are numerous and many of them have links to other frequencies for all uses of Amateur Communication including Packet.

I have been an Amateur Radio Operator since 1994 and started out with a "Technician" (No Code) license. I have spent many hours studying and upgrading to "Advanced" and I am still continuing to study and learning about this hobby, plus large amounts of money in the equipment, including two 70 cm band radio's especially training for emergency communication and demonstrations for disasters. Most of these simulations have taken place in conjunction to ARES and RACES organizations which use the 2 M and 70 cm bands. I have felt the hobby was worth the time and money spent in obtaining these privileges to use these bands. I feel that any interference with the reallocation will jeopardize training and communication in a real emergency or disaster.

Thank you for letting me make this public comment, and your continued effort in keeping the Amateur Radio Bands in tact.

Sincerely,



Gary G. Openshaw
KC7AWU
861 Roosevelt Avenue
Salt Lake City, Ut 84105

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