

(mainly for improved quality and improved network utilization). This conversion will make communications much more secure, and will make the methods proposed by this NPRM unneeded.

Section one limits the coverage of the NPRM specifically to "receivers capable of switching between four or more frequencies between 30 MHz and 960 MHz and capable of stopping at and receiving a signal detected on a frequency" and exempts test equipment and computer-controlled single-frequency receivers. Also, it pertains to new scanners being sold. It therefore does not prevent or reduce the availability of receivers that can pick up cellular telephone calls.

Section three discusses "hardening" the electronics of the scanner. This will make it more difficult to manufacture scanners, and will make it impossible to repair them when they become defective. It will raise the prices of scanners, place an undue hardship on consumers, and have very little effect on modifying them to receive cellphones.

Sections nine and ten requires that scanners not be modifiable or, through the use of frequency converters, not be able to pick up cellphones. In one sentence, this simply bans all scanners. Using readily available electronic components, I can build a converter that can make cellular calls audible on any frequency I wish. With it, I can receive cellphone calls using a scanner (even one with the improved image rejection figures proposed in the NPRM) that is tuned to, say, the police band or TV channel 5. Such modifications would be possible even if the entire scanner is potted in epoxy.

Eliminating reception of images is the mark of a good scanner, and one that manufacturers should strive for. It, however, should not be a legal requirement.

Conclusion

It is human nature to be interested in what their neighbors do. Especially if they are shouting their private business for all to hear.

While it is cheaper for cellular telephone manufacturers to cause laws to be enacted to make it illegal to listen to those yelling away, it is much more proper for them to use techniques to make it harder to understand what they are saying. With the upcoming switch to digital technology, they are doing just that.

I feel that implementing this NPRM will impose unneeded burdens upon the public (after all, it is already illegal to both listen to cellular telephone and to divulge or use any information you hear doing so), even long after cellphones go digital, and would do very little to prevent people from listening to these banned communications. After all, one could easily build a frequency converter (not from a kit, since that is banned, but from scratch, or by modifying one that is still legal to use in other services) or even building the entire radio from scratch.

It would also continue the practice of allowing special interest groups to decide that they don't want people listening in to their specific piece of spectrum.

Sincerely,



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