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

Merlin E. Griffin WB5OSM
11671 E 80th ST N #BB
Owasso, OK. 74055-3346

RE: **RM-9267** July 1, 1998

I am opposed to RM9267 for the following reasons:

1. The LMCC says they propose sharing two band segments with amateur radio, with amateur radio being the secondary service. However, they make no suggestions as to how this sharing would work. I find it difficult to believe that high power Land Mobile systems using FM could coexist with amateur operations in the 420-430 segment which is used primarily radio amateurs engaged in "weak signal" over the horizon work using modes like single side-band and CW.

2. The LMCC talks of Amateur radio keeping its exclusive world-wide allocation from 430-440 MHz for development of "emerging technologies." So we're just supposed to used digital modes, and spread spectrum? What about land mobile, they don't mention anything about them, are they intending to take advantage of new technologies, or in this 20 MHz of spectrum are they just planning to replace conventional non-trunked analog 5 kHz deviation FM repeaters from amateur radio, with the same thing from Land Mobile. This may be their intent, as amplitude compandered side band has not been commercially successful in the 220-222 MHz band. Which was taken away from amateur radio in order to develop this technology. Since land mobile apparently has little or no use for this, perhaps it should be considered to give this band back to amateur radio.

3. In my capacity as a net control operator for SKYWARN, we make extensive use of the 440-450 MHz band. To provide direct communications between the National Weather Service Forecast Office in Tulsa Oklahoma and many of its served counties in Southeastern Oklahoma and Northwest Arkansas. Remember that Ft. Smith Arkansas recently sustained a direct hit with an F2 Tornado. Land-line based warning mechanisms failed that night. The only way the warning got out, some television and radio stations were monitoring the SKYWARN nets in the Amateur Radio Service. Repeaters in the VHF band in Ft. Smith Arkansas and Prairie Grove Arkansas are linked to a repeater in the Tulsa Oklahoma Area, using the frequencies in the 70 cm band. This allows the net control station at the National Weather Service in Tulsa to easily communicate with weather spotters in Arkansas. Then there is another elaborate system of linked UHF repeaters that tie in many of the counties south of Interstate 40 with the National Weather Service. Loss of these 70 cm systems would seriously impeded communications during severe weather events here in the center of Tornado Alley. These systems also exist to provide communications support to the Salvation Army's disaster relief units. The SATERN net provided extensive disaster relief communications during the search and rescue mission in response to the Oklahoma City Bombing Disaster., the worst act of domestic terrorism ever.

4. In my capacity as vice-president of Oklahoma Repeater Society inc. we are already struggling with balancing the needs of FM repeater users with those of other modes, and Oklahoma is a relatively un-populated area. I can imagine what it is like for the major metropolitan areas.

5. In my capacity as a site engineer for Tulsa Repeater Organization inc. I already deal with the frustration of harmful interference from inter-modulation and spurious radiation products from the paging service on our 144-148 MHz band. Which we are not sharing with land-mobile, they're eight MHz above us. We're constantly trying new receivers, and adding cavity filters and re-orienting antennas in order to try to minimize

the interference. Now the mess is creeping into the 70-CM band, and if this proposal becomes reality, we will have their systems within the same band as us, then the interference will grow much worse.

6. As a member of the board of directors for the Tulsa Repeater Organization I know of the investment we have in the 70 CM band. We own and operate two FM voice repeaters and one Amateur Television system operating in the 70-CM band. The total cost of replacing these systems with brand new systems in the 900 MHz or 1200 MHz bands may be around $25,000. This is with much of the labor being donated.

7. What of the current primary user of this Spectrum? Since the Soviet Union and Berlin Wall have both fallen, we seem to have declared World Peace. However, we currently have our armed forces in harms way in Bosnia, and it doesn't look like they'll be coming home any time soon. Iraq and North Korea keep us on the edge of Brinkmanship at all times. Now India and Pakistan are rattling nuclear sabers. What about the former Soviet Union? We're not real sure who has their fingers on the "button." Finally remember that it wasn't all that long ago that we fought Dessert Storm. Yes even after world peace was declared we had an honest to goodness real shoot'in war on our hands. Let's not be too hasty to remove resources from our military that they may need on a moment's notice.

8. Oklahoma Disasters in which Amateur Radio Provided public service communications to government or disaster relief agencies.

Incident	Agency Served
June 8, 1974 Multiple Vortex Tornado strikes the Tulsa Metro Area.	NWS, TAEMA
December 24, 1975 Tornado Touch down in east Tulsa	NWS, TAEMA
Morris Oklahoma 75% destroyed by a tornado.	NWS, Baptist Ch.
SE Tulsa Telephone Exchange Sabotaged by criminals	TAEMA
Tornado Strikes Manford and Prue OK. Very serious damage.	NWS, TAEMA,
200 yr. Flash Flooding in Tulsa Memorial Day 1984	NWS, TAEMA
Flood of Record October 1986 Tulsa Metro Area	NWS, TAEMA, U.S. Army Corps of Engineers
F3 Tornado Strikes Areas near Wesport and Ooloagah	NWS, TAEMA
Oklahoma, some casualties, major damage.	RCEMA.
F4 Tornado strikes Extreme eastern Tulsa and Catoosa OK.	NWS, TAEMA
Major Damage, and casualties	Salvation Army
Tulsa Area Amateurs were dispatched to Oklahoma City to Support the disaster relief efforts in the aftermath of the bombing of the Alfred P. Murrah Federal Building in OKC> .	Salvation Army
Tulsa Area Amateurs were dispatched to the St. Louis Area to support Disaster relief efforts during the Mississippi. River Flood	Salvation Army
F2 Tornado touches down in McAlester OK. & Ft. Smith AR.	NWS & others
Major damage and casualties..	
Father's day 1998 80-100 mph straight line winds hit the Tulsa metro Area between 1:30 and 5:00 A. M. doing significant damage. Also Major power outages occurred. A few injuries.	NWS, TAEMA

This is just the few incidents I can recall off the top of my head where local amateur radio operators provided support to our community in times of need. I don't have all the dates, but I am certain you can dig through the records of the National Weather Service and the Tulsa Area Emergency Management Agency and get all the details. To maintain this kind of public service commitment, Amateur Radio needs the entire 70 CM band. Sharing with Land Mobile is not a viable option.

Sincerely

Merlin E. Griffin, NE OK District Emergency Coordinator ARRL
WB5OSM