

**Before the**  
**Federal Communications Commission**  
**Washington, D.C. 20554**  
**In the Matter of**  
**Amendment of Parts 2, 15, 80, 90, 97 and 101**  
**of the Commission's Rules Regarding**  
**Implementation of the Final Acts of the World**  
**Radio communications Conference (Geneva, 2007)**  
**(WRC-07), Other Allocation Issues and Related**  
**Rule Updates ET Docket No. 15-99**  
  
**Amendment of Parts 2, 15, 80, 90, 97 and 101**  
**of the Commission's Rules Regarding**  
**Implementation of the Final Acts of the World**  
**Radio communications Conference (Geneva, 2012)**  
**(WRC- 12), Other Allocation Issues and Related**  
**Rule Updates**

To the Commission:

Comments from Ronald R. Douglass Sr,  
NI7J Amateur Radio Extra Class Operator  
WH2XND Experimental Operator

**Introduction**

I was first licensed in 1978 as KA5BIN license lapsed due to moving to HOA.

Extra class amateur radio operator license granted 10/24/2006, NI7J is vanity call.

Experimenter's license granted 12/3/14 as WH2XND.

The transmitter and antenna location: 1614 East Dolores Rd. Phoenix, Az 85086.

Transmitter is Flex-6500 driving class D 20 watt home built amp with ERP under 1 watt , later granted 10 watt ERP now transmitting with home brew 70 watt class D amp.

Transmitting antenna is 100 foot four wire cage vertical supported by 72 foot tower with 21 feet of two inch DOM tubing added to the top of tower. At the top of D.O.M. tubing is a Delrin insulating bushing that isolates an additional section of 6061 aluminum tubing with a small caphat for a total height of 100 feet. First MF transmission date 1.23.15.

APS "Arizona Public Utility" 240 KVA transmission lines are located due East of my location 2,325 feet (708 meters) using Google Earth as measuring device.

I have logged over 2400 hours of transmission time **with no complaints!** "See comments about PLC Awareness in Closing Statement"!

## **Comments**

472 – 479 KHz (630 Meters) and the 2200 meter allocations.

I support the changes that are requested in the Notice of Proposed Rulemaking (NPRM) granting a secondary basis allocation to amateur radio from 472 – 479 KHz (630 Meters).

I also support the changes that are requested in the Notice of Proposed Rulemaking (NPRM) granting a secondary basis allocation to amateur radio from 135.7 – 137.8 KHz (2200 Meters).

For many years and thousands of hours of operations amateur operators have been performing experimentation in this band under the call sign WD2XSH with no interference complaints from PLC devices utility operators being noted.

These experiments has shown that amateurs can operate efficiently from many locations around the nation with no impacts to PLC devices.

If the truth were to be known, PLC systems are being removed by the utility companies at a faster rate than most people know!

A 5 watt EIRP lowers the potential of interference and so does the use of a vertical polarized antenna that will reduce the chances of interference greatly.

**Closing Statement:**

All MF and LF operators have the ability to be proactive by contacting their utility company Engineering Dept. to inquire about use of PLC devices in their area before transmitting!

I know this as a fact, I have contacted both utility companies APS and SRP in Arizona and have received the PLC location and operating frequencies as requested.

Respectfully submitted 7.13.2015.

Ronald R. Douglass Sr

Amateur and Experimental operator NI7J/WH2XND