

Marlene H. Dortch
Secretary Federal Communications Commission
445 12th Street, SW Washington, DC 20554

Re:

In the Matter of review of the Commission's Part 95 Personal Radio Services Rules WT Docket No. 10-119

WT Docket No. 10-119

WT Docket No. 10-119

Dear Ms. Dortch:

We would like you to consider the following revisions to the part95 GMRS band and the FRS band:

- 1.FRS channels 1 - 14 to remain license-by-rule
- 2.FRS should not exceed ½ watts ERP
- 3.FRS/GMRS all in one 22 channel radios should not exceed 1 watt ERP in GMRS and ½ watt ERP in FRS and should have a non removable antenna.
- 4.FRS should operate with a non removable antenna
- 5.FRS should remain analog with 12.5 KHz bandwidth only.
- 6.GMRS channels 1 – 8 non repeater handhelds should not exceed 4 watts ERP.
- 7.GMRS mobile/base/repeater should not exceed 75 watts ERP.
- 8.GMRS should be allowed wide or narrow band – 25, 12.5 and 6.25KHz
- 9.GMRS should have a new “advanced” license type for digital communications
- 10.GMRS should be allowed digital emissions for DMR, P25 and other variants ONLY with an advanced GMRS license
- 11.PTT ID system such as MDC1200 should be allowed for unit ID purposes.
- 12.User generated text messages should be allowed but only on with a digital license and in a digital mode.
- 13.User generated text messages should NOT be allowed on the FRS channels.
- 14.Voice inversion or digital encryption should NOT be allowed on GMRS or FRS. With the growing problems with domestic terrorism and the recent incident in Oregon this poses a potential problem for law enforcement who wish to listen in on domestic terrorist chatter on such bands.
- 15.Users who have a criminal history involving militia or terrorist activity or are know to be active in militia activity SHOULD NOT be granted a license to operate on GMRS, MURS, or Ham radio.
- 16.Multi tone call tones (call buttons on FRS) should be eliminated or at the very least made to a single tone and MUST not be activated more than once every X amount of minutes.
- 17.FRS and GMRS units transmitting GPS data should be an option that can be enabled or disabled by the user either in a menu, by a button, or through PC programming and ONLY allowed on designated emergency frequencies.
- 18.Simplex repeaters on FRS should NOT be allowed.
- 19.GMRS repeaters should have a CW ID system installed that ID's itself every 60 minutes
- 20.GMRS repeaters with community shared panels such as the ZR310 should have CW ID for the

repeater and CW ID for the permitted license holders
21.GMRS repeaters should NOT be allow to phone patch.

We know this may be asking for a lot but please consider some of it for review, at least the digital emissions, We believe this would attract more users to the band at an affordable price and cut back on congestion on the current analog systems.

The matter of GMRS having its current TX wattage increased by 25 watts we believe would better help those who are in a rural area far from a local repeater.

We are not trying to sell gimmicks, we are only trying to create more use of the band(s) and keep people safe.

Sincerely,

Ronnie Drummond
Elfnet Designs & Communications