

ADDENDUM TO MY REPLY COMMENTS ON THE REPLY COMMENTS OF MR. JAMES EDWARD WHIDBEE,
PETITIONER

In further examining the facts as they pertain to Mr. Whidbee's (unlikely) potential to gain a truly useful figure on spectrum usage, the following is noted:

Mr. Whedbee's station location, per his listed address in the FCC's own database, puts him at N39D 11M 37S, W94D 31M 36S. This puts him within the greater Kansas City metropolitan area. The next closest metropolitan area is St Louis, Missouri, 249 statute miles to his east.

Typical simplex distances on the two meter band (144-148MHz) are:

Handheld-to-Handheld on flat terrain @ 5 watts (146.52MHz)	1.5 to 6.0 miles
Mobile-to-mobile on flat terrain @ 30 watts typical	5.0 to 15.0 miles
Mobile-to-fixed station (fixed station omni-directional Antenna @ 30', both at 30 watts typical)	5.0 to 20 miles
Fixed-station to fixed-station, omni-directional antennas @ 30'. 30 watts typical	15.0 to 35 miles

All distances assume no man-made or natural obstructions, assume no form of repeating or other relaying and do no account for any transient metrological or unusual propagational anomalies or regional reflections due to geological structures that only benefit a given geographical area.

Distances are taken from the several texts of the American Radio Relay League, "CQ Magazine" And "73 Magazine" and averaged. Numbers are conservatively compounded at 20% error rate.

The distances covered improve, of course when the antenna is higher, is a gain-type (13 element Yagi-Uda as an Amateur Radio service standard), and output power is significantly increased via the use of a linear amplifier, the use of which, although allowed by regulation, is also discouraged by regulation in the caveat that Amateurs use the least amount of power necessary in order to establish and maintain working communications.

The point here, however, being that the petitioner has presented absolutely no documentary evidence of actual, practical survey of the electromagnetic spectrum either at HF, VHF or UHF allocations, and cannot therefore justify the changes to Part 97 sought, and that unless he can demonstrate having the resources to adequately survey those allocations, this petition is groundless. His anecdotal comments regarding a handful of CW transmissions he may or may not have overheard are just that...anecdotal.

I remain,
In Service to the Country

/s/ STEVEN JAMES ROBESON
Amateur Radio Station K4YZ
Winchester, TN

