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West Creek, NJ 08092-9329
January 25, 1999

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Federal Communications Commission
Washington, DC 20554

RE: RM-9404

Gentlemen:

Enclosed are comments I am submitting on a recent Petition for Rulemaking, RM-9404. I have also sent a copy to the petitioner, the American Radio Relay League, Inc., per Part 1 of the Commission's Rules.

Sincerely,


Philip E. Galasso

(Enclosure)

cc: The American Radio Relay League, Inc.

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Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, DC 20554

In the Matter of:) RM-9404
)
 A Proposal to Create a Low-Frequency Allocation) Comments
)
 in the Amateur Radio Service)
)

I, Philip E. Galasso, am the licensee of Experimental Radio Service Stations KA2XUJ and KA2XUK, both authorized to operate in the frequency band from 160 to 190 kHz. I am also the licensee of Amateur Radio Station K2PG. I hereby submit comments on a Petition for Rulemaking, RM-9404, recently filed by the American Radio Relay League, Inc. ("ARRL").

Amateur use of frequencies below the present-day AM broadcast band (535-1705 kHz) dates back to the earliest days of radio. When the United States entered World War I in 1917, the Amateur Radio Service was closed down by the government for the duration of the war. Amateur radio operation resumed after the signing of the Armistice in 1918, but amateur radio stations were barred from frequencies below 1500 kHz and soon were allocated specific bands of frequencies above 1750 kHz.

Over the years, there has been a resurgence of interest in exploration of the propagation characteristics of the low frequencies below the AM broadcast band. Numerous radio operators, including many licensed in the Amateur Radio Service, have been building small transmitters for 160-190 kHz under the terms of Part 15 of the Commission's Rules, communicating over surprisingly long ranges at low power. In recent years, the United Kingdom and several European countries have amended their amateur radio service regulations to permit limited

operation of amateur radio stations in a narrow band of frequencies around 136 kHz. The band from 160-190 kHz, used by the Part 15 experimenters in this country, is allocated to the broadcasting service in Europe and is therefore unavailable to amateur radio stations there.

I agree with the ARRL that an amateur radio frequency allocation from 160-190 kHz and near 136 kHz would be very desirable. However, the ARRL petition, RM-9404, contains a proposal to limit all amateur radio stations to not more than 2 Watts EIRP. I oppose this provision of RM-9404 on two grounds:

1. One of the stated purposes of the Amateur Radio Service is to foster experimentation. While the efficiency of most common antenna designs for these low frequencies is quite low, why should amateur radio operators be discouraged from trying to develop antennas with better efficiency?
2. Few, if any, amateur radio operators have the means of calculating or measuring EIRP. Field intensity meters, such as the Potomac Instruments Model FIM-41 (commonly used in AM broadcast work) do not cover the frequencies below the AM broadcast band. Moreover, these instruments are very expensive.

I would like to propose, as an alternative, that amateur radio stations be allowed to operate on 160-190 kHz and near 136 kHz with a transmitter output power not exceeding 200 Watts peak envelope power (PEP), with no restrictions on ERP, EIRP, or antenna efficiency. Furthermore, I would like to propose a power increase to the usual amateur power limit of 1500 Watts PEP, should it be demonstrated that amateur radio stations may use these frequencies at this power level without causing harmful interference to other services on these frequencies. Furthermore, to encourage experimentation, I would like to propose no emission subbands on 160-190 kHz, although the narrow proposed allocation near 136 kHz should, of course, be restricted to narrow-band modes.

Dated this 15th day of January, 1999

By: Philip E. Galasso