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Mr. Collier has previously filed comments with the Commission in several rule makings involving the ARS (Amateur Radio Service), GMRS (General Mobile Radio Service), and other services. He was the original petitioner in the still pending rulemaking number RM-9107 concerning organizational licensing in the General Mobile Radio Service.

Because of his experience and insight Mr. Collier is immensely qualified to offer comments in the matter of RM 98-20.

Support for Reconsideration of Docket 98-20.

In undertaking RM 98-20, the Commission had noble goals. The current FCC license application structure, with its multitude of forms and excessive paperwork, was confusing and burdensome. By creating the Universal Licensing System (ULS) the Commission has made great strides in simplifying the licensing process for a great many radio services. Likewise, the Commission had the best interests of the public at large, and especially the interests of spectrum users, when it undertook its biennial review to eliminate unneeded rules in these radio services.

However, in regard to the General Mobile Radio Service (Part 95A of the FCC rules), the Commission took several actions which were, frankly, quite bewildering and which will have a severe negative impact of the users of the GMRS. In fact, many of these changes were not even addressed in the docket, and seem to be unintended.

The most egregious of these changes pertains to the status of the 462.675 / 467.675 MHz repeater pair. In the past, 462.675 / 467.675 MHz has been available for all types of permissible communications to those users who were licensed for it. It has further been available, for emergency traffic and motorist assistance only, to all other licensed GMRS users, whether they were specifically licensed for the channel or not.

The new rules prohibit use of the .675 channel, except for the use of emergency communications and motorist assistance, by all licensees.

This rule change alone assures that repeaters will not be available for emergency use on the 675 channel. This because, without personal users to support the cost of keeping a repeater on the air, most users of 675 will not be able to afford to keep their machines operational. Instead, they will move the

repeaters to other channels, leaving the 675 channel unmonitored. In trying to create an emergency-only channel on 675 the Commission is actually assuring that no help will be available on this frequency!

This change represents a major change in the way that the 675 channel has been treated in the past, and a departure from the FCC's policy for the service. Further, the change was not even mentioned in the Report and Order, thereby depriving GMRS users from having adequate notice and time to comment on the change.

For this reason, I would ask the FCC to expediently reverse its ruling on the use of the 675 channel. If the Commission wishes to pursue the idea of reserving 675 for the sole purpose of emergency and traveler's assistance, it should proceed with a separate rulemaking on the subject.

Respectfully,

Kenneth J. Collier