Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of	)	
	)	
Biennial Regulatory Review -- Amendment	)	WT Docket 98-20
of Parts 0, 1, 13, 22, 24, 26, 27, 80, 87,90,	)	
95, 97, and 101 of the Commission's Rules	)	
to Facilitate the Development and Use of	)	
the Universal Licensing System in the	)	
Wireless Telecommunications Services	)	

COMMENT ON PETITION FOR RECONSIDERATION

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I. BACKGROUND OF THE COMMENTER.

Commenter is a licensed GMRS user who has a material interest in major changes in rules governing the use of GMRS.

II. COMMENTS ON PRSG PETITION

Without suggesting a lack of support for other concerns of PRSG, I would like to comment specifically about the new restrictions placed on the use of 462.675 MHz. This particular change in GMRS rules is one that will immediately and negatively impact the use of my station.

Restricting communications on 462.675 MHz was not the stated intent of the FCC. It is clear from the writings of the FCC with regard to WT Docket 98-20 that it was the FCC's intent to simplify regulations, streamline the licensing process, and eliminate unnecessary regulations. Adding restrictions to GMRS licensees cannot be consistent with these stated goals. It was my literal interpretation of the new rules that communication on 462.675 MHz would be restricted to emergency and travelers assistance only.

Restricting communication on 462.675 MHz is not justified. In the FCC's NPRM and in the Report and Order, there was no discussion of the need for new restrictions on channel use. Effectively, a new regulation was promulgated without there being a stated need. In fact, logic tells us that restricting use of 462.675 MHz may actually degrade emergency communication by immediately requiring thousands of transmitters to be tuned to another frequency. Receiver tuning will

follow the transmitters. Also, there was no discussion of how this new regulation will benefit emergency communication. Has there been any complaints about poor emergency communication because of channel congestion? Has the FCC considered this aspect? If so, what are its findings? Is there any evidence at all that the new restrictions will solve a problem that actually exists? The lack of justification of the new restrictions strongly suggests that the FCC was confused and further restrictions on GMRS users was not its intent.

The new restrictions will negatively impact GMRS users. Thousands of radios will have to be re-tuned. Changing frequencies changes the nature of interference. New interference will result and new solutions will have to be found. In urban areas, crowded GMRS channels will become more crowded. Repeaters may have to be shut-down because of a lack of channel availability. It is not difficult to imagine millions of dollars in direct and indirect costs to comply with an unjustified regulation intended to solve an unidentified problem.