

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

In the matter of:)
)
Amendment of Parts 73 & 90 of the) RM-9719
Commission's Rules to Permit The)
Transmission of Emergency Signals)
on Channel 200)

REPLY COMMENTS OF REC NETWORKS

1. REC Networks ("REC"), a group of people interested in the establishment of a Low Power Radio Service for use by individuals, community groups, local churches and schools files the following reply to several of the parties who filed comments in the above captioned proceeding.

2. *International implications of ERDS.* REC feels that Grupo Televisa S.A.'s ("Televisa") concerns about the international implications of a mobile ERDS service¹ and its effect on international allotments of Channel 6 (as well as FM Channel 201) are valid and must be given priority when considering a service such as ERDS. Since the proposed ERDS stations are mobile, we can not properly coordinate ERDS operations with fixed broadcast operations in the foreign countries. REC supports an international agreement² which would permit fixed Class-D (secondary) as well as future fixed "microradio"

1 - Televisa's comments at 6. Also, SBE at 22.

2 - Creation of a Low Power Radio Service, MM Docket 99-25, Revised Comments of REC Networks at 50.

stations to be permitted to operate Channel 200 (as well as Channels 198 and 199) where interference to domestic Channel 6 and 201 are not a factor. REC reminds the Commission that we have proposed that LPFM stations, including those in the border areas be permitted to operate a maximum of 10 watts with a 10m HAAT on Channel 200 in locations which are at least 138km away from a full-power Channel 6 TV station. We support the use of directional antennas on LPFM stations in border areas to limit radiation beyond the frontier.

3. *ERDS provides a "back door" into everyone's radio.* As with several participants³ in this proceeding, we too are scared about the fact that any radio pirate or terrorist can use a transmitter and an RDS encoder in order to "break-in" to compatible radios. No considerations for security or encryption have been taken into consideration by the petitioner. Unless the petitioner can provide us with a security protocol for such as service, ERDS is not safe or secure on any frequency.

4. *108.1 could not be made available for any type of broadcasting.* WCPE has stated in their comments⁴ that the frequency 108.1 MHz should be made available for low-power FM broadcast stations. We need to remind WCPE that 108.1 is within an international allocation for aeronautical radionavigation. 108.1 is currently used by VHF omni-range ("VOR") stations and to place any type of a broadcasting service on this channel would cause severe damage to the world's air traffic system. We do agree with WCPE that Channel 200 (87.9) should be used for [fixed] LPFM stations.

3 - Televisa at 13, SBE at 4, NPR at 9.

4 - Comments of Educational Information Corporation, para. 5

5. *Virginia Center and WKJCE comments should be considered timely filed.* On October 7, 1999, REC had filed a timely motion for extension of time on this proceeding. This was done due to a Commission administrative error where the Electronic Comment Filing System was not opened for electronic comments. The Commission, nor its delegated authority had not acted on our motion at the comment deadline. Virginia Center attempted to file their comments on the evening of October 14, the original comment deadline. They had experienced server errors. WKJCE had filed their comments at the time that they did in anticipation on an order on REC's motion. For these reasons, we feel that the comments of Virginia Center and WKJCE be as considered timely filed.

6. *In conclusion.* As we have seen in the comments, the petitioner's proposal for the ERDS service, even though it may benefit the public in certain ways, as proposed, it is a threat to broadcasters, radio listeners, international relations, the implementation of a future Low Power Radio Service, KSFH(FM) in Mountain View, CA and could even be a threat to our national security. For these reasons, we uphold that the Commission DENY Federal Signal Corp's. petition and TERMINATE this proceeding.

Respectfully Submitted,

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October 21, 1999

CERTIFICATE OF SERVICE

A copy of this proceeding is going to be served upon the petitioner:

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REC Networks welcomes service of documents via e-mail. Please send documents to rec@recnet.com . Please use MS Word, ASCII or PDF formats. Thank You.