

To the FCC regarding RM-9807:

As a CBer for decades and a columnist for two national radio hobby magazines and a licensed amateur radio operator (KB2GOM), I believe that rescinding the 155 mile limit on CB communications is simply the common sense thing to do, or several reasons:

1. It takes “off the books” a rule that is simply ill-conceived and contrary to natural phenomena. Long-range propagation of CB signals occurs because ionospheric conditions allow them – when the “skip” is in, it is sometimes easier to talk hundreds or thousands of miles on a legal signal that it is to talk 5 or 10 ten miles. Even lower power limits scarcely make a difference – just ask any radio ham who engages in QRP operation. No rule that the FCC can conceive, write or enact can prevent that. The FCC might just as well write a rule that it will never rain on the weekends; it would make as much sense.
2. Enforcement of the current rule is unworkable. You would have to prove that the illegal long-range communication has taken place and locate the station involved. This is silly waste of already limited resources.
3. If the FCC were serious about enforcement of this rule, it could have done something about the hundreds of Puerto Rican stations that already use Ch. 9 – reserved for emergencies and traveler’s assistance – to “shoot skip.” Since the FCC has not done so, I presume it doesn’t care about the 155 mile limit rule. Why retain a rule that you don’t intend to enforce anyway?
4. Removal of the rule “decriminalizes” those who talk more than 155 miles. See all of the above.

I understand that ARRL has objected to removing the 155 mile limit because it would put CB in competition with ham radio. These comments should be disregarded for two reasons. First, this is a CB matter, not ham radio. ARRL has no standing to comment. Second, since the CB service was created from frequencies that were previously part of the amateur radio 11-meter band – a “DX band – CB is, de facto, in competition with ham radio. Only relocating the entire CB service can change that. If CB stays where it is, this is a non-issue, since it cannot be changed.

The National Association of Broadcasters has objected because illegal amplifiers cause interference. This proposal is not about power limits. NAB’s objection is specious and has nothing to do with the issue at hand.

In short, you have a rule that was dumb to start with because it runs contrary to natural phenomena and enforcing it would be difficult and cumbersome at best. Do the right thing – make this inappropriate rule go away.

Sincerely,
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