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Office of the Secretary
Federal Communications Commission
Washington, DC 20554

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OCT 24 2000

FCC MAIL ROOM

Re.: Petition for Rulemaking
In the Matter of

Amendment of Part 95, Subpart B,
Family Radio Service (FRS) Rules
Establishment of Channel 1 (462.5625 MHz) as a
National Calling Channel.

Petition to Enhance the Functionality of FRS and to
Better Facilitate Communications Involving
Personal Safety, Traveler's Assistance, and
Emergency Communications.

15 August 2000

Greetings:

Please accept the enclosed petition for rulemaking in reference to the above captioned
subject.

Regards,



Alan Dixon

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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Re.: Petition for Rulemaking)
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Establishment of Channel 1 (462.5625 MHz) as a)
National Calling Channel.)
)
Petition to Better Facilitate)
Communications Involving)
Personal Safety, Traveler's Assistance, and)
Emergency Communications,)
And to Enhance the Functionality of the)
Family Radio Service.)

GREETINGS:

SUMMARY

The Family Radio Service (FRS) is a low-power two-way radio service utilized by a diverse group of individuals and entities. In its short history, FRS has never had a universally recognized calling or distress channel. Inevitably, situations will occur in which an FRS user is in an emergency situation, and in which the user's only immediate means of communication is an FRS radio. Further, such situations will inevitably occur when other FRS users with immediate access to alternate means of communication are within range of the FRS station in distress. However, without a common calling or distress channel, the FRS station in distress must attempt communications on 14 different frequencies, and 38 different Continuous Tone

Coded Squelch System (CTCSS) codes. This equates to 532 logical channel combinations, a situation hardly conducive to rapid communications response. Additionally, some FRS units are equipped with a multitude of Digital Coded Squelch (DCS) codes, exponentially increasing the total effective channel combinations. A common calling channel, with standard, default carrier-operated squelch use, and standard Frequency Modulation (FM) F3E emissions would immediately enable rapid emergency contact for all FRS users with no retrofit or obsolescence of existing multichannel FRS radios. Nor would establishment of a common, national calling channel impose any burden on existing FRS users.

DISCUSSION

Whereas; no national or universally-recognized calling channel or distress channel exists for the Family Radio Service, and

Whereas; FRS stations in distress must presently attempt communications on fourteen frequencies and 38 CTCSS squelch codes for a combination of 532 logical communications channels in order to establish contact, and

Whereas; some FRS stations in distress must presently attempt communications on fourteen frequencies and numerous DCS squelch codes for an even greater combination of logical communications channels in order to establish contact, and

Whereas; future regulatory and design considerations may permit modes and modulation schemes other than standard FM - F3E emissions in FRS,

Whereas; a single national FRS calling channel with a recognized operating procedure of disabling tone squelch will establish a single method of emergency contact, and

Whereas; a single national FRS calling channel will enable FRS stations not in distress to quickly establish communications with other nearby FRS stations for ordinary communications, and

Whereas; the designation of a particular channel to be used as an FRS calling channel does not preempt other heretofore permissible uses of such channel, and

Whereas; the establishment of FRS channel 1 as a calling channel provides an easily remembered channel number, and

Whereas; the establishment of FRS channel 1 as a calling channel enables General Mobile Radio Service (GMRS – FCC Part 95, Subpart A) operators the ability to monitor said channel and to respond to FRS distress calls thereon, and

Whereas; the establishment of FRS channel 1 as a calling channel imposes no burden on existing FRS users since all existing FRS radios capable of Channel 1 operation may continue their normal, routine operation on said channel, yet may immediately utilize the channel as a calling channel, and

Whereas; future design and manufacture of FRS radios capable of multichannel scanning with Channel 1 as a priority scan channel will open new equipment marketing opportunities for manufacturers, and

Whereas; the establishment of FRS channel 1 as a calling channel will likely result in an improvement in life-safety as well as in greater, more facile utilization and enjoyment of the Family Radio Service.

SEEKING

Now therefore; this petition seeks the immediate official establishment of FRS Channel 1 as a universally recognized calling channel for all areas within the jurisdiction of the Federal Communications Commission. Collaterally, this petition seeks immediate official recognition of the use of default carrier-operated squelch as the proper operating technique for those stations wishing to monitor FRS Channel 1 for calls from any other FRS station. Further, this petition seeks immediate official recognition of the use of standard Frequency Modulation F3E voice modulation, free of any digital vocoding, encryption, or speech scrambling technique, as the proper operating mode for those stations wishing to initiate contact on FRS Channel 1 to other FRS stations.

CONCLUSION

The proposed rule change herein is clearly in favor of the public interest, convenience, and necessity. It imposes no measurable burden on any party concerned. Your careful and prompt consideration is greatly appreciated.

SUBMITTED

This day, 9 October 2000

Alan Dixon



Industry-recognized senior telecommunications engineer

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General Radiotelephone Operator PG-4-19631

GMDSS / Radar Operator and Maintainer DB-GB-005305

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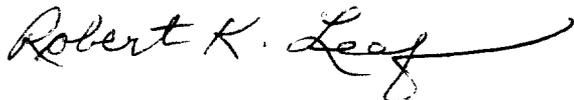
Former Member – Baltimore County, Maryland Fire Communications Committee

Former Member - Baltimore County, Maryland 911 Task Force

Former Member – TIA / EIA Standards Committee TR45-AHAG

CORES FRN 0003-3350-56

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Founder of Radio Communications Monitoring Association

Founder of Crest Communications

33 years work with volunteer emergency radio communications organizations