

From: <ak437@acorn.net>
To: <bcross@fcc.gov>
Date: 12/20/00 2:20PM
Subject: FRS // RM 10019 - Comments relay to correct person ???

DUCKET FILE COPY ORIGINAL

Hi:

Library Computer wont let me in to file comments on Rule Making RM-10019. Family Radio Service.

Could you Have My comments, forwarded, so they get into the record.

TNX

Dale (See Below)

TO THE FEDERAL COMMUNICATIONS COMMISSION
1919 M Strret
Washington, D.C. 20554

IN IN RESPONSE TO RM-10019 "frs channels restrictions'

In 1968, 1982, 1983, 1984, and 1986 I filed comments, requests for a radio service, away from the general Citizen Band Radio Service, to Avoid cross interfearence between the (2) services and Part 15 devices.

There was also a need for un-regulated and un-licensed communicatons for small farms, business, and industry that was not going to comply with FCC regulation. The last RM filiings was about 10 years to early, as later Radio Shack used the basic idea some +12 years later to ask for FRS radio service in and near General Mobile Radio Service (Old Class A Citizen Band)!

My original Idea carried a "Simple Licensing" requirment, As the (Class B Citizen Band at 465 mc). From the early 1960's

My original Idea also carried a few more Frequencies then the present FRS.

Because the FRS is well established today with 14 channels, and more than +80 Tone Codeing, Scrambleing, and future digital use, as GPS, and logicial ILLEGAL use is present today.

To add a Convert a present Channel for Calling is Absurb, and with the number of FRS radios that presently have TONE squelch blocking on Channel 1, will not monitor Un-Muted problems.

The Best Idea for this would be to make need rule changes That would "Assist" the FRS.

Current FRS radios have a estimated life span of 2 to +7 years, most if used day to day will not last beyond 4 years on a avarage.

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There is lots of time to establish, rule changes, that will work.

Even if the FCC establishes Channel 1 as Calling, Only, How are you going to get adbusers off that channel, and open the squelch for monitoring.

The Fcc has long established the requirement to monitor the channel before Transmitting, This requirement has been overlooked by the FCC "Type Approval" or "Type Accepted" sceeme!

The current FRS radios block incoameing radio messages from other type of radios, to save the battery, make it more "Family" of sorts.

The following changes are suggested

1. Establish a "New" additional channel for FRS called Channel "E0" or limited to Emergencys Only.

This channel would Encode only tone 100.0, decode would be blocked. Receiver could be "noise" or "carrier" squelched. When this channel is selected manual for monitoring or transmitt.

2. Establish a "New" (4) additional calling emergency channel's for FRS, Called "C-1", "C-2", "C-3" and "C-4. As above the radio would emitt only PL 100.0 encode, however the decoder would be standard 100.0 cps to prevent squelch openings due to local QRM type of interefrance from computers, other radio systems. No other tone squelchs would be allowed.

3. The 100.0 is a very common PL Tone used by Government, and Private Users, That is why it should be called a "Universal" Tone in the Part 95, and part 15 subparts of the CFR 47. Rules should be in place to prevent the use of this tone except for emergency and calling on new FRS and other Part 15 devices. Rule changes in various parts of of Part 90 will be need, as the suggested "New" additional channels will have to come from the Part 90 frequencies near GMRS and Business Band around the 462 and 467 mc Band

4. Changing the Current FRS radio to "Monitor" before they Transmitt would be again "Absurb" and "Not Enforceable" The Changes need to be established on all "New" mfg FRS Radios. Old Radio would be allowed to "Wear Out" and "New" mfg radio must have a + making advantage.

5. The "New" mfg radios advantages, may-be, Additional RF power Output, a few more additional channels, Automatic In Range Data Transmitt for Selective Calling as TTP paging!, Standard, & Common GPS receiver input with auto re-call via TTP polling.

6. With "New" mfg FRS radios, The radio may not trasmitt untill the "Monitor" button is depressed, with in a Time Frame, so that the Coded Squech remained in "carrier" or "Noise" squelch for monitor. So that frs Operator makes shure the channel is open and clear before his call is made.

7. Only "new" FRS radio units would be able to take advantage to

the New Emergency, Calling, and GPS/Selective Call TTP options.

8. The FCC by changes to part 95 would, establish Channel 1 of the FRS as a "EC" Channel for "Calling Only and Working Emergency" requiring operators not to have "Tone Blocked" receivers. and to encode only 100.0 cps PL. The new display would be required to Flash Off/On/Off/Oh when using this channel. FRS radios left to monitor this emergency channel would

have a period of "Beeps" every 5 min's remind them that on a call channel. Governmental & authorized search teams could use this channel for short messages only. Governmental and authorized search teams would not be required to have the "beep" notice active. The idea of having the receiver "Beep" on the stop channel's that are for emergency would to make sure knows not to transmit by accident

9. The "FRS" "Home" Channel limited for calling and emergency working would be the to current units that are presently in the field today.

10. Additional Channels for FRS from Part 90. The current 12.5 kc sub splits of Channels near 462 and 467 mc business band would be "Bench Marked" for use on the FRS as a secondary basis! The additional channels would have power outputs from 100mW to 2 Watts. A suggested time frame established by the FCC to stop new licensing on the 12.5 kc splits near GMRS, Giving Primary status to current licensees. The hope that the commission would establish, about 14 new working channels at 100mw, 14 new working channel's at 1 watt, 14 new working channels at 2 watt, and "E0", C-2, C-2, C-3, C-4 would be at 2 watts. Channel 1 would also be called "EC" power level would be allowed 1 watt

11. The present FRS system is overloaded in high population area, the need for a plan for both emergency's and standard non emergency communications is need. The FCC got FRS started about 20 years to late! More Input from the Public, and the manufactures is need. Additional Ideas are need to solve the overcrowding, and lack of enforcement problem's! Upgrade the system, with additional new frequencies, for both Emergency / Emergency & Calling / Emergency Working/ and Standard Working channels are need. This suggestion has the commission making a total of 69 channels for the FRS need that for the next 25 years. The FCC should make the additional channels in planed 5 years staged upgrades. The upgrades would be planned, and staged in a orderly system.

12. Standard PL's beyond the normal EIA could be clearly outlined in the FCC parts involving CFR 47 it would be hoped that Non-Standard PL be only a user select menu on FRS Radio's. Tone Code 100.0 would only be allowed on frequencies FRS termed for calling or emergency.

13. It is suggested that FRS radios be only allowed to operate on the 8 standard GMRS Base/Repeater Outputs, at a level of 75mw Calling the Channels as S-1, S-2, S-3, S-4, S-5, S-6, S-7, and S-8. Carrier Squelch Only, 100.0 encode. The channels would be called Simplex "Search & Special Events" allowing the general public to call security or medical aid at public events. Intercommunications with GMRS allowed, for event only.

14. The FCC should require TOT on all new FRS and GMRS radios in the mfg plans for Type Acceptance. The TOT must send a alarm to the user. In the additional requirements, Radio Operation life of its

power supply, Automatic low power is a requirment on limited channels to save battery time, however a Mfg should be required to state normal duty time rating under a standard each radio mfg. No one would want a 2 watt family radio if the batterys would normaly only last 4 horus. a established duty cycle rating of radios is need.

In short this idea of a calling channel & emergency channel is a good Idea, but it need a bit of more kick in the rump. The lack of reasonable judgement by the commission expand the FRS, make improvements, come up with a Time Table of changes to make need service upgrades has not been at the best intrests of the radio public, or manufactures!

Lots of changes are need!

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