Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Review of Part 15 and other Parts	)	ET Docket No. 01-278
of the Commission's Rules	)	RM-9375
	)	RM-10051

To: The Commission

COMMENTS OF THE TEXAS VHF-FM SOCIETY, INC.

IN RESPONSE TO NOTICE OF PROPOSED RULE MAKING

The Texas VHF-FM Society is an organization of approximately 700 Amateur Radio Repeater owners and operators in the State of Texas. This organization provides coordination for approximately 1500 repeaters in Texas.

Many of these repeaters have linking systems utilizing the 420 to 430 MHz frequency range for the purpose of extending the communication range of the systems. The number of these linking systems has grown to the point that there are virtually no additional frequencies available in the 420 to 430 MHz range using the standard 25 KHz channel spacing that the available equipment was designed for. Some 12.5 KHz channels have been used successfully with sufficient geographic spacing without suffering performance degradation. Additional growth in future years will demand that the 433 to 435 MHz spectrum be used for these links. The path distance for these repeater-to-repeater links is typically 40 to 50 miles with several operating at distances of up to 100 miles. Some of the longer link paths are not line-or-sight but still work reliably using edge diffraction over the blocking terrain. The equipment used for these links includes high gain antennas and low-noise preamps to achieve the desired performance. Even with state-of-the-art equipment performance, the fade margin is minimal. Some systems typically operate with received signal levels of –107 dBm (1 microvolt) or lower.

These repeater systems are regularly used for public service activities in addition to day-to-day amateur communication. These public service activities include SKYWARN and other weather related events, Radio Amateur Civil Emergency Service, Red Cross, Amateur Radio Emergency Service, and support of other charitable events such as marathons, bicycle rides, etc.

The proposed RFID systems in the 425 to 435 MHz frequency range using increased power and higher duty cycle such as the SAVI proposal constitute a real threat to the disruption of communication for the above mentioned public service activities. These public service activities frequently extend beyond the range of an individual repeater

system and depend on the above-described repeater-to-repeater links to provide the necessary communication coverage.

SAVI has filed some reports of proving non-interference based on not opening the squelch of a nearby FM receiver tuned to the frequency of the interrogator / transponder system. This is not a valid proof since it does nothing to demonstrate that other communications on the frequency would not be disrupted. The test SAVI conducted only proved that the modulation and resulting spectrum of their transmitters did not result in sufficient noise quieting in the FM receiver to open the squelch circuits. With these RFID systems operating along all major transportation routes, the probability of disrupting existing communication in progress is significant. The sheer number of proposed emitters would certainly overwhelm any co-assigned channels. The duty cycle of the proposed emitters would vitiate any probability of usable shared allocation. Future growth of RFID systems in the proposed 425 to 435 MHz band will impact a large majority of the multiple repeater, linked systems across Texas. While the normal day-to-day amateur communication can tolerate some occasional disruption, the disruption of communication during weather events, natural disasters, or other catastrophes affecting the health and welfare of the public becomes much more significant.

In conclusion, the Texas VHF-FM Society must express very strong objection to the proposed rules changes allowing RFID devices as described by SAVI in the 425 to 435 MHz frequency range. The potential impact to the public service provided by the amateur community is significant enough to warrant relocating the proposed RFID system to another frequency range outside the amateur 420 to 450 MHz band. Propagation characteristics in this narrow segment of the spectrum are not sufficiently unique to justify the potential damage to the public health and welfare communications described above.

Respectfully Submitted,

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