

I am Don Byrer, KJ5KB and also UK call G0POH. I currently work for the FAA in Cleveland Ohio maintaining Radar, Data and Comm equipment.

This petition would allow transient 'non-US residents' to operate PMR446 within the US (with no callsign, no ID, etc).

There are many problems I see with this proposal:

-446.0-446.1 is used in many areas for repeater links as well as simplex. How would you like your local Skywarn or public service operation to be interrupted by "John Smith" on his PMR446 HT?

-If a "visiting/transient/tourist non-amateur non-United States resident foreign national" can use PMR446, what's to stop any US resident from doing so, too? This is almost unenforceable. This would likely create a large "gray market" for PMR446 radios being imported to the US, and further the potential for interference.

-Many previous changes in FCC regulations have been made in the assumption that other countries will follow suit and allow reciprocity. In the case of CEPT and CITEL Amateur radio licensing this has worked well. However, these agreements did not involve CHANGING existing frequency allocations. I have been a UK licensed amateur for 12+ years, my call is "G0POH". In my opinion the likelihood of the UK allowing legal operation of US FRS radios is about 0/0. Why should we allow them to operate over here? With the price of FRS radios dropping rapidly, anyone who can afford to travel to the US should be able to afford a pair of FRS radios AND OPERATE LEGALLY.

-In the UK, there is a CEPT "CB" allocation and a UK "CB" allocation in the 27 Mhz range. Both use FM vs AM here in the US. Shall we also 'grandfather' these into legality?

-Being unlicensed, there would be no 'self-policing' as we have in the amateur bands, i.e, frequency accuracy, deviation, audio quality, etc...

-What is to stop a PMR446 user from 'assuming' a callsign and pretending they are a licensed amateur radio operator? We have enough of this already on HF...

-If anything, the FCC should put more emphasis on public awareness that PMR446 and any other such radios are not legal for unlicensed operation in the US.

Thanks, Don Byrer KJ5KB/G0POH
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