

November 13, 2002

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Federal Communications Commission
Attn: Marlene H. Dortch, Secretary of Commission
OFFICE of the SECRETARY
445 - 12th Street - S.W.
Washington, D.C. 20554

Dear Secretary:

Enclosed you find the required original and the number of required copy's as per the information I have.

The Public Library Computer that was used has no direct control over the type size in point value. All it has is Very Small - Small - Medium - Large - Extra Large. I used the size that was close to the 12 point value.

This request for a Rule Making Docket Number is submitted in the best form that I can do at present having limited communications "H" problems, so I hope it meets the need requirements.

The basic requirements for format & content I suspect have been complied with I suspect. If you should have any questions please feel free to communicate.

Thanks

Dale Reich

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requiring testing and inspection to make sure that the modified ham radio is not causing interference to other licensed services is the objective. Setting up the framework for workable FCC technical standards for the modified radios used by Amateur Radio Operators.

Re-establishing some common HF use frequencies in the 27 Mhz area that Business, Ham, Public Safety, and Local Government could share on a on Site Emergency without major licensing hassles of the federal government. Also allowing higher RF profile of the Government & Business Stations That may use the frequencies near 27 Mhz in connection with the proposed changes.

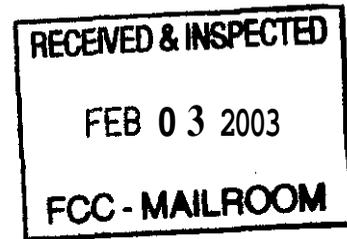
In the area of Local Government & Public Safety Radio emergency on site communications vehicles could be have the suggested new 24 watt output radios to communicate with the General Public, Contractors, or On Site Help on CB Channels 23, 24, 25, 26, and 27 as they in the past the channels were assigned to the previous Public Safety, Land Transportation, and Business Band radio services with that the higher RF power limit than the current CB power limit. Easy and Simple Licensing for Contractors and Vendors doing business in the 27 Mhz area is also requested to make it easy for on site assistance and inter department / agency communication.

Changes in Part 2 of the communications act dealing with Amateur Radio Operators being able to "Certify" for one's own use non-type approved or non-type accepted equipment is the issue. If Amateur Radio Operators are allowed to "Self Certify" for their owned equipment that may be used may have to be addressed by the commission, The judgment call as to who would be a good inspection source, types of tests, and required procedures.

Respectfully submitted,

Dale E. Reich

Before The
Federal Communications Commission
Washington, D.C. 20555



PETITION FOR RULE CHANGE

Petitioner
Walter E. Reich)
141 North Center St.)
Seville, Ohio 44273)

RM Docket Number _____

Changes Requested in Part's 15 - 90 - 95 - 97:

This proposed request is to allow inter communications between [Ham] Amateur Radio Operators, Public Safety, and Citizen Band Operators at special public safety events, and on site emergency operations.

Under this suggested rule change Ham Radio Operators would be allowed the use a few limited frequencys for emergency and event communications with out the need for licensing or type acceptance in part 95 of the Ham Radio Equipment.

Rule changes would be drafted in both part's 97, 95, and Part's 15 to allow intercommunications between ham radio operators and other event parties that may operate Part 15 Voice or Data Devices, Part 95 sub sections of the rules covering the Citizen Band [CB], General Mobile Radio Service [GMRS], Family Radio Service [FRS], and the Multi-User Radio Service [MURS].

Under this suggested rule change only frequency in Part 95 would be allowed to be used, with the same technical standards applied to the Ham Radio Operator as if he was licensed, There would be some Exceptions to the General Rules as outlined in this future suggested rule change.

In Part 15, only the 27.00 Mhz to the 27.26 Mhz Voice Communications could be used. The RF Power limit to less than 100 mW. In the 49 Mhz Part 15 Band only the current 5 channels with a RF power limit of less than 70 mW.

In Part 95, Citizen Band frequencys would be 26.965 Mhz, 27.065 Mhz, 27.085 Mhz, 27.255 Mhz, and 27.405 Mhz may be used. The RF Power Limit of no more than 3 Watts Output at the antenna. 27.065 Mhz is for emergency only as defined by part 95, and 27.085 Mhz may only be used to establish non emergency contact. Special Note that 27.255 Mhz is shared with other services, and that the RF power output for ham radio operator would be 24 Watts Output, or 30 Watts input to the final.

In the past channel 23, was shared with Land Transportation, Public Safety, Business Radio Service, and still also the R/C Class C radio control. The RF power In the past was 3 watts input. The RF is still the 24 / 30 watt rule for R/C using this frequency today.

The FCC would change the rules that would allow all Part 90 services to use the The following Frequencys for General Use under part 90. The frequencys listed will be 27.245 Mhz, 27.255 Mhz, 27.255 Mhz, 27.265 Mhz, and 27.275 Mhz as "General Business Radio Service" on a shared bases with the Citizen Band Frequencys / Channels. The Business / Public Safety user would be allowed to use 30 watts input, or 24 Watts output as a rule. Only emissions that would be allowed would be emissions covered in part 95. Changes in part 90 would also upgrade the 27.510 Mhz and the 27.530 Mhz frequency to the General Business Band The RF Power Limit would be raised to 30 Watts for the listed Frequencys The following Frequencys would also be included in the General Business Band. 27.430 Mhz, 27.450 Mhz, 27.470 Mhz, and 27.490 Mhz. Frequency Coordination would not be need for Stations South of Line A Canada. The Line for Mexico would be moved inland from it

present a additional **+75 Miles**. Again Stations would not require coordination, but simple licensing only

The RF Power limit on **27.430 Mhz**, **27.450 Mhz**, and **27.470 Mhz** would be raised to **750 Watt's** Output for stations not requiring coordination. The only requirement for licensing is that new narrow band communications emissions be employed. The use of older wide band emissions would be limited to past licensee's.

The Frequency **27.490 Mhz** would still be a Itinerant & mobile use frequency. the RF power limit on this frequency would also be raised for new narrow banded to **250 watts**.

The principal object is to allow Public Safety, General Business Band, Citizen Band Operators to overlap in working plan with [Ham] Amateur Radio Operators for special events, and real emergencies!

Under this suggested plan the amateur radio operator could use non-type accepted or type approved communications devices as long as it meets the standard of the other service's.

Some HF ham radios will not work at the **4 watt** level that the Citizen Band current rules, so by bring up the old **30 watt** standard of the past for CB Channel **23** with is **27.255 Mhz** this would allow one common frequency for working & emergencies. The use of non-type approved equipment by the ham would be limited to the emergency event or the opening and closing of a special public safety event only.

Part **90** rules changes would allow event staff hold easy to obtain licenses for the operations, and give the event staff a few other frequencies to conduct business on without the normal FCC hassles. Public Safety Could also be licensed on several frequencies with the need RF Power for the emergency or event that the **4 watt** level lack today needs.

Amateur Radio Operators may In the Multi-Use Radio Service only the **154.600 Mhz** frequency could be used by Ham Radio Operators for on site public service event communications with the same technical standards.

Amateur Radio Operators may in the In the General Mobile Radio Service only **462.675 Mhz**, **462.550 Mhz**, and **462.725 Mhz** could be used at a power level of less than **2 Watts** simplex only mode of communications only. Communications Restricted to on site emergency only coordinating with public safety or local government

Communications with GMRS licensee who would be acting as a public safety manager or coordinator for the event also permitted.

Amateur Radio Operators may In the Family Radio Service FRS any of the current authorized frequencies used for event or on site emergency communications. Communications only relating to the public safety & event coordination only.

Rules for Part **15** communications devices, Part's **90**, **95**, and **97** would include the terms "Inter-radio emergency and event on site communications permitted for need communications related to the event only."

The Amateur Radio Operator [Licensee] would have to his modified equipment certified by a qualified source under this provision to operated an non emergency events. The FCC would define the qualified inspection source in its rule making. stating what tests must be conducted, and a pass or approve letter of certification shall be in the file of the Amateur home station file that the equipment can meet current technical standards of the various sub part that the fcc will allow on site temporary communication. A user tag must be also attached to the unit stating unit approved for Inter Radio Service Emergency & Event Communications stating the approved sub parts must be listed. Use by the Amateur Radio Station Licensee for other then event communications would be outlawed.

The object of this requested rule change is that a great deal of Amateur Radio Service Licensees are modifying there equipment to operate out of the Amateur Radio Service. They are using in some case FRS and GMRS to communicate with non hams for personal communications and event communications on a regular basis. The general accepted idea by the Ham Radio Community is "Who Cares" - "The FCC will never catch U S - "Im not going to carry around, Three of Four Radios". The usual comments from ham's who break the communications act and know it! In a real emergency hams have violated the communications act for the need to protect and save life! The need to address the radios that are of good construction and more than meet the needs FCC standards for other services is the issue.

By Allowing this Inter-Radio Service arrangement to allow only event based need communications, and