

DEC - 7 2006

04-140

Sandralyn Bailey

From: David Giuliani [David@Giuliani.org]
Sent: Sunday, November 19, 2006 4:46 PM
To: KJMWEB; Michael Copps; Jonathan Adelstein; dtaylor@tateweb; Robert McDowell
Cc: Steve Waterman-K4CJX
Subject: Please Fix FCC "Omnibus" Amateur Radio Report and Order dated 11/15/06

Federal Communications Commission
Office of the Secretary

We ham radio operators urgently request your intervention to fix an inadvertent error made by the FCC that prevents use of PACTOR 3. We need this fixed before the effective date of 12/15.

PACTOR 3 is an important part of the Winlink 2000 system, which is the ham radio digital communications system designed to work during Katrina scale disasters. Tens of thousands of hams use and maintain this system. Many county and state agencies have spent monies for their ham radio volunteers for Winlink 2000 and PACTOR 3. This system is used by over 8,000 vessels at sea.

The FCC restriction preventing PACTOR 3 was an "inadvertent error" according to Bill Cross of the FCC. However, the FCC is not showing a willingness to change the order before its implementation date, 12/15.

So, please instruct the FCC to fix it now.

Sincerely, David Giuliani

WA6PXX

Mercer Island, Washington

SandraLyn Bailey

FILED/ACCEPTED

04-1440

From: Alan Levine [wa5lqz@communicomm.com]
Sent: Sunday, November 19, 2006 4:18 PM
To: Jonathan Adelstein
Subject: Omnibus R&O Amateur Radio

DEC - 7 2006

Federal Communications Commission
Office of the Secretary

Dear Mr. Adelstein

Subject: FCC Omnibus R&O, Amateur Radio rule changes.
Set to go into effect December 15th, 2006

Please do not let this mistake become law.

Having been a part of the emergency radio communications team during both hurricanes Katrina and Rita last year I can attest to the value of the Pactor 3 digital mode for handling message traffic for our served agencies. Homeland Security officials all over the country have seen the value of this mode and invested many thousands of dollars in making this mode available for use at their locations. Individual Hams such as myself have invested many dollars in the effort to better serve our communities and the country when called on. The system as exist today does absolutely no harm to the spectrum and should not be either relocated or eliminated.

The 80 and 40 meter bands were and will be in the future, the workhorse bands for handling emergency messages. Please consider correcting the wording of this R&O to allow digital modes such as Pactor 1,2,and 3 to operate on the frequencies between

3600 khz and 3650 khz on 80 meters. This would relieve the pressure on the CW portion of the band and would certainly be more beneficial to emergency communications than giving this segment to the SSB Extra class operators..

I am certain that there are many other "talking points" and they could and should be described. Winlink 2000 has been instrumental in continually finding missing or distressed vessels offshore. It does so mainly for the US Coast Guard. It has been instrumental in many domestic and international hurricane and fire incidents where no other communications was available. The list is partial on www.winlink.org/news.htm. It has been instrumental in being the main communications medium for over 8,000 vessels at Sea, all Amateur operators, who use the robustness and speed of Pactor 3 to receive WX information for their own safety and well-being while at Sea. There is more.

. J2D emission was (to quote Bill Cross, FCC) put in the 500 Hz restriction by an "Inadvertent error." This was only supposed to be in an attempt to change IMAGE from analog to digital. In "redefining data" they make this error and "inadvertently included J2D."

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Please consider correcting this situation as soon as possible for the good of all concerned.

Thank you for your consideration

Alan Levine WA5LQZ

ARRL District Emergency Coordinator

SW Louisiana

Wa5lqz@arrl.net

337 436 6047

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Sandralyn Bailey

From: K7WFR [k7wfr@hughes.net]
Sent: Sunday, November 19, 2006 2:42 PM
To: KJMWEB; Michael Copps; Jonathan Adelstein; dtaylorataweb; Robert McDowell
Subject: WT Docket 04-140

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**Federal Communications Commission
Office of the Secretary**

Re: WT Docket 04-140

A terrible mistake is being made! Please stop this!

My name is Jim Wooddell.

I have been an Amateur Radio Operator since the early 70's. I am an FCC Licensed GRO. I am also involved with communications as a professional in the telecommunications industry for over 22 years. I am also a COML for my County emergency services as well as the Chairman of my County's Republican Party. I am a Firefighter, Wildland Firefighter (FFT2,RADO,COMT(t)), First Responder and Wilderness First Responder. I am a certified instructor for CERT, CPR, First-Aid and AED. I am actively involved in emergency situations and I take this Docket seriously and I am not writing this to blow smoke. You need to listen to what I am saying here. I carry on my shoulders ESF2 and ESF4 responsibilities.

I want to share with you the reason why I think it is of the utmost importance to keep and expand HF digital communications and in particular P1, P2 and P3 (pactor) and the WinLink 2000 system.

Last week I was deployed to Thousand Oaks, California to help resolve a major RFI issue at the Verizon RCC/EOC. The RFI was/is disrupting their ability to communicate on HF on the Federal SHARES system as well as the Amateur bands. It is of vital importance to the Federal Government to be able to communicate with ESF2 organizations during disasters, etc. Well, voice communications were nearly impossible on Tuesday and Wednesday, the week 11/6. I brought in my portable HF Winlink station and within minutes I was able to send two messages via Pactor 2 and Pactor 3 that would have otherwise not be sent. Do you understand this ability? There should be no technical question about this.

It is my opinion that having this ability is of vital importance. I feel that it is negligent of this country's leadership, at any level, including the ARRL, to disregard positive technical advances in communications and not support them to the best of their ability. Certainly, Pactor works at levels far beyond voice communications and Amateur Radio Operators use this to great advantage.

This asset needs to grow and expand and the ARRL and our government should be behind the expansion of this service 100%.

I support the Amateurs that are making positive growth in this area and I feel you should too! Look at the Katrina reports! You'd have to just be plain stupid to not see the positive side of growing this asset and expanding frequency allocation for this vital service.

I honestly feel that the decision I am seeing is mis-informed and negligent. The ARRL board should be focusing on supporting digital efforts and that should included first and foremost listening to those who are affected the most by their actions. The ARRL board ought to be fighting for and demanding from our government more spectrum for HF digital radio operations, pactor 1,2, and 3 and others.

Sincerely,

Jim Wooddell
K7WFR

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Sandralyn Bailey

From: doc [doc@mitre.org]
Sent: Sunday, November 19, 2006 2:32 PM
To: KJMWEB; Michael Copps; Jonathan Adelstein; dtayloratateweb; Robert McDowell
Subject: FCC Report & Order

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**Federal Communications Commission
Office of the Secretary**

FCC 06-149
WT Docket No. 04-140

Sir;

I am appalled and very concerned that the referenced action by the FCC will seriously curtail the ability of Amateur Radio operators to provide the emergency and welfare communications afforded by the use of High Frequency efficient digital communications using the Winlink 2000 network.

I run one of the many radio general entry points in the US and I assist in running the first two of several planned entry points for Emergency digital communications (EmComm) in the State of Massachusetts. The recent FCC R & O dictates, as of December 15, 2006 that the Massachusetts network be forced to shut down and that the other entry points be sorely limited.

The rumored 'oversight' by the FCC in the above referenced Report and Order will prohibit the use of voice bandwidth data speeds on all High Frequency Amateur Radio (beyond-line-of-sight) bands and will also prohibit any unattended operation on our 3.5 Megahertz band. The latter is critical to providing reliable communications across our State. If the R & O is allowed to stand, the US will be the only country to prohibit such operation.

I respectfully request that you do what can be done to have the FCC 'oversight' be publicly acknowledged in such a manner that we can continue to utilize voice bandwidth digital transmissions and that the 're-farming' of frequency segments on our 3.5 Megahertz band re-enable unattended operation in part of the band.

Respectively submitted;

David G. Willard, W1EO
Carlisle, Massachusetts

04-140

Sandra Lyn Bailey

From: Mail [wkuechle@midsouth.rr.com]
Sent: Sunday, November 19, 2006 2:12 PM
To: Robert McDowell
Subject: FCC Omnibus R&O, Amateur radio rule changes.

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In the recent November 15, 2006, Federal Communications Commission Report and Order they have placed a limitation on digital communications bandwidth. Specifically the J2D data limitation to 500 cycles bandwidth will eliminate Factor 3, as well as other developed data communications methods, for use by Amateur Radio operators. Factor 3 is used widely by the Amateur Radio community for emergency communications. Factor 2, which does meet the new FCC regulations, is 4-5 times slower than Factor 3.

The Winlink system is a major emergency communications system that provides the end user in the field, with email capability. This includes attachments. This system has also been mentioned in the congressional record as a result of it's use during Katrina. The Winlink system prefers to use Factor 3 because of the speed advantage. This allows them to handle more messages or larger attachments. AN example is that the Central Earthquake research Institute, located in Memphis TN, needs to send shake maps to the TN EMA in Nashville. Shake maps are about 170K in size. This will take about 6.5 min for Factor 3 to send and 30+ min to send using Factor 2.

The other Area of concern is that the FCC has eliminated the Automatically Controlled Data station sub-band on 80M (3.5Khz-4.0Khz). 80m is the most useful band for area (100mi- 500mi) communications at night due to the nature of HF (High Frequency) propagation. The next available band from data communications is 40M (7.0Mhz - 7.3Mhz). This band is subject to interference from legal broadcasters in Europe and Asia. It opens up for long range (500mi - 2000mi) communications at night. At the present time the 60M Amateur Radio allocations are not open for data communications.

As the Report and Order, as published in the Congressional Record on November 15, 2006, will be effective on December 15, 2006 the matter needs the attention of everyone concerned with the security and safety of the country. AS Katrina showed any communications system can be rendered inoperable when most needed. Amateur Radio is the only service that has the flexibility to maintain communications for both local (5-50 mi) as well as regional.

William A. Kuechler
Amateur Radio Call N9ACQ
Secretary Shelby County Amateur Radio Emergency Service
Katrina responder

04-140

SandraLyn Bailey

From: Rex G. Carr [rexgcarr@sover.net]
Sent: Sunday, November 19, 2006 1:47 PM
To: dtaylor@tateweb
Subject: FCC WT Docket 04-140 (FCC 06-149)

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**Federal Communications Commission
Office of the Secretary**

re: FCC WT Docket 04-140 (FCC 06-149)

Dear Sir, the FCC has changed some rules that will cause major limitations in both the development of Amateur Radio as a tool/hobby but, also cause major limitations in our ability to respond to a disaster as we have in the past. Please look into this and stimulate action, ASAP or the delay will be unmanageable. The bottom line is that we need our radio service to be able to use modern modes of data communications below 30 Mhz. Please read below.

Respectfully,

Rex G. Carr, M.D. AA1KL
Emergency Coordinator Southern Grafton County Amateur Radio Emergency Service, New Hampshire

1. FCC "Omnibus" Amateur Radio R&O published in Federal Register, takes effect December 15 (Nov 15, 2006 [REVISED Nov 16, 2006 10:20 ET]) -- Just a little over a month after the FCC released the Report and Order (R&O) in the so-called "Omnibus" Amateur Radio proceeding, WT Docket 04-140 (FCC 06-149) to the public, a revised version appeared today in the Federal Register.

<http://a257.g.akamaitech.net/7/257/2422/01jan20061800/edocket.access.gpo.gov/2006/pdf/E6-19189.pdf>

In addition to extending the SSB portion of the Amateur 40 and 80 meter bands, this change affects the data emission segment of the amateur bands to change IMAGE from analog to digital and restrict it to emissions of a bandwidth of 500Hz or less. In making this change, the FCC has "inadvertently" eliminated the use of the Pactor 3 data transmission protocol (J2D), as this protocol has a bandwidth of 2400Hz.

2. J2D emission was (to quote Bill Cross, FCC) put in the 500 Hz restriction by an "Inadvertent error." This was only supposed to be in an attempt to change IMAGE from analog to digital. In "redefining data" they make this error and "inadvertently included J2D."

3. The impact is horrific. Not only will it impede the use of Winlink 2000 as a last resort email extension during disasters, as was described in the "Failure of Initiative" Congressional Report regarding Katrina, it will also have an impact on the many agencies who have been funded by DHS for their Amateur communities to implement Winlink 2000 and Pactor 3. In addition to DHS funding, many County and State agencies have spent monies for their Amateur volunteers on Winlink 2000 and Pactor 3.

Rex G. Carr, M.D.
AA1KL
NHARES EC Southern Grafton
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W 603-643-5254
H 603-643-4329
C 603-252-7152

04-140

Sandralyn Bailey

From: Al Francisco [alf@AIS-CPA.com]
Sent: Sunday, November 19, 2006 1:19 PM
To: KJMWEB; Michael Copps; Jonathan Adelstein; dtayloratateweb; Robert McDowell
Subject: WT Docket 04-140

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Federal Communications Commission
Office of the Secretary

FCC Omnibus Amateur Radio R&O published in Federal Register, takes effect December 15 (Nov 15, 2006 [REVISED Nov 16, 2006 10:20 ET]) -- A month after the FCC released WT Docket 04-140 (FCC 06-149) to the public, a revised version appeared in the Federal Register.

<http://a257.g.akamai.net/7/257/2422/01jan20061800/edocket.access.gpo.gov/2006/pdf/E6-19199.pdf>

This change affects the data emission segment of the amateur bands to change IMAGE from analog to digital and restrict it to emissions of a bandwidth of 500Hz or less. In making this change, the FCC has inadvertently eliminated the use of the Pactor 3 data transmission protocol (J2D), as this protocol has a bandwidth of 2400Hz.

J2D emission was (to quote Bill Cross, FCC) put in the 500 Hz restriction by an "inadvertent error" in an attempt to change IMAGE from analog to digital. In redefining data they make this error and inadvertently included J2D.

The impact is horrific. Not only will it impede the use of Winlink 2000 as a last resort email extension during disasters, as was described in the "Failure of Initiative" Congressional Report regarding Katrina, it will also have an impact on the many agencies who have been funded by DHS for their Amateur communities to implement Winlink 2000 and Pactor 3. In addition to DHS funding, many County and State agencies have spent monies for their Amateur volunteers on Winlink 2000 and Pactor 3.

Winlink 2000 has been instrumental in continually finding missing or distressed vessels offshore. It does so mainly for the US Coast Guard. It has been instrumental in many domestic and international hurricane and fire incidents where no other communications was available.

See www.winlink.org/news.htm. It has been instrumental in being the main communications medium for over 8,000 vessels at sea, all Amateur operators, who use the robustness and speed of Pactor 3 to receive WX information for their own safety and well-being while at sea.

Al

Al Francisco K7NHV
alf@AIS-CPA.com

04-140

SandraLyn Bailey

From: notify@yahoogroups.com on behalf of Mike Burton [n6kzb@n6kzb.com]
Sent: Sunday, November 19, 2006 1:19 PM
To: Jonathan Adelstein
Subject: Copy of Email sent to Bill cross at FCC

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DEC - 7 2006

**Federal Communications Commission
Office of the Secretary**

Subject: FCC Omnibus R&O, Amateur radio rule changes.
Set to go into effect December 15th, 2006

Please do not let this mistake become law.

The changes in bandwidth and symbols that make U.S. amateurs no longer to use Pactor 3, Clover, or other type digital modes, will be a major setback in emergency communications support.

WinLink 2000 with Pactor 3, as an example, is the single success story for the served agency in quite some time. Having been at this game of HF communications support, I urge a correction to ensure Pactor 3, and such modes are not removed from the U.S. amateurs tool box. (www.winlink.org)

Please ensure this so-called more than 500 KHZ, "oversight", does not become a matter of law. Please ensure Pactor 3 and other such advances in amateur radio continue to be a front runner in EmComm and Homeland support.

Thank you.

Mike Burton, Retired
Public Safety Communications
Visit me at: www.n6kzb.com

04-140

Sandra Lyn Bailey

From: Jab Murray [jabmurray@grandecom.net]
Sent: Sunday, November 19, 2006 1:15 PM
To: Robert McDowell
Subject: Omnibus Amateur Radio Proceeding

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DEC - 7 2006

Federal Communications Commission
Office of the Secretary

Dear Sir,

I bring to your attention what appears to be an inadvertent error and ask for your prompt intervention to correct. This refers to the Report and Order (R&O) in the "Omnibus" Amateur Radio proceeding, WT Docket 04-140 (FCC 06-149) published November 15, 2006 in the Federal Register.

The clear intent of the Federal Communications Commission to not impose a 500 Hz bandwidth limitation on existing emission types was reversed when the regulation appeared in the Federal Register. The manner in which the revised rule is written in the Federal Register, a 500 Hz bandwidth limitation will be applied to existing data emission types. This contradicts the Commission's clear intent. Prompt action is necessary before the revised rules go into effect December 15.

Failure to promptly correct this error will result in an **immediate degrading of the United States' Amateur Radio service's ability to efficiently provide long distance, high speed, data communications during incidents and disasters**; was one of the best practices cited by many Hurricane Katrina response reviews. **If not corrected before December 15, the U.S. will be the only country prohibiting the use of the most efficient, long distance, high speed, data emission modes by their Amateur Radio service.**

I encourage you to act promptly to correct this inadvertent error before the new rules come into effect. Thank you.

James L. Murray, Corpus Christi, Texas

Amateur Radio Operator K5CNZ, heavily involved in emergency communications supporting served agencies during disasters

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SandraLyn Bailey

From: Jerry Reimer [jerryreimer@charter.net]
Sent: Sunday, November 19, 2006 7:40 AM
To: KJMWEB; Michael Copps; Jonathan Adelstein; dtayloratateweb; Robert McDowell
Subject: Federal Register reversed Commission decision - 47 CFR Part 97

Federal Communications Commission
 Office of the Secretary

I bring to your attention what appears to be an inadvertent error and ask for your prompt intervention to correct.

The clear intent of the Federal Communications Commission to *not* impose a 500 Hz bandwidth limitation on existing emission types was reversed when the regulation appeared in the Federal Register. The manner in which the revised rule is written in the Federal Register, a 500 Hz bandwidth limitation *will* be applied to existing data emission types. This contradicts the Commission's clear intent. Prompt action is necessary before the revised rules go into effect December 15.

Failure to promptly correct this error will result in an immediate degrading of the United States' Amateur Radio service's ability to efficiently provide long distance, high speed, data communications during incidents and disasters; was one of the best practices cited by many Hurricane Katrina response reviews. If not corrected before December 15, the U.S. will be the only country prohibiting the use of the most efficient, long distance, high speed, data emission modes by their Amateur Radio service.

I encourage you to act promptly to correct this inadvertent error before the new rules come into effect. Thank you.

Jerry Reimer

FCC 06-149
WT Docket No. 04-140

IV. DISCUSSION

A. Amateur Station Frequency Privileges

16. In the *NPRM*, the Commission sought comment on whether it should revise the definition of data emission types contained in Section 97.3(c) of our Rules to include emission types **A1C** and **F2C**. This would permit amateur stations to transmit FAX emissions having an occupied bandwidth of 500 Hz or less on the frequency segments used for data communications. The *NPRM* also noted that limiting the occupied bandwidth of image emissions in data segments of the HF bands to 500 Hz or less would provide the amateur service community greater flexibility in developing communication systems and communications technology, thereby furthering that purpose of the amateur service while maintaining the narrow bandwidth nature of the data emission band segments.

17. Decision. All commenters who addressed this issue support the *NPRM* proposal to revise the definition of data in the amateur service rules. We agree that permitting images to be transmitted on data emission frequency segments will "allow amateur radio to make the most of new [software]

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programs” thereby “advanc[ing] its technology.”

19. ARRL also requests that we not impose a 500 Hz bandwidth limitation in the definition of data emissions, arguing that this limitation would have unintended consequences because the limitation also applies to amateur service bands in which a higher symbol rate or bandwidth is permitted.

...

To accommodate the concern raised by ARRL, however, we will revise our rules to clarify that the 500 Hz limitation applies only to the emission types we are adding to the definition of data when transmitted on amateur service frequencies below 30 MHz. By amending the rule in this manner, the 500 bandwidth limitation will not apply to other data emission types or amateur service bands in which a higher symbol rate or bandwidth currently is permitted.

Federal Register/Vol. 71 No. 220/Wednesday November 15, 2006/Rules and Regulations

§ 97.3 Definitions.

* * * * *

(c) * * *

(2) *Data*. Telemetry, telecommand and computer communications emissions having designators with A, C, D, F, G, H, J or R as the first symbol; 1 as the second symbol; D as the third symbol, and emissions **A1C**, F1C, **F2C**, J2C, J3C, and J2D having an occupied bandwidth of 500 Hz or less when transmitted on an amateur service frequency below 30 MHz. Only a digital code of a type specifically authorized in this part may be transmitted.

* * * * *

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04-140

Sandralyn BaileyFederal Communications Commission
Office of the Secretary

From: Tom Lafleur [lafleur@lafleur.us]
Sent: Wednesday, November 22, 2006 6:22 PM
To: KJMWEB; Michael Copps; Jonathan Adelstein; dtayloratateweb; Robert McDowell
Cc: bandplan@www.arrl.org; William Cross; w3kd@aol.com
Subject: FCC 06-149 "Omnibus" Amateur Radio Report and Order



Bilbray_112206.doc
(35 KB)

Dear Chairman Martin, Commissioner Copps, Commissioner Adelstein, Commissioner Tate, and Commissioner McDowell

Reference:

WT Docket No. 04-140, also known as "FCC Omnibus Amateur Radio Report and Order";

FCC 06-149 (66460 Federal Register / Vol. 71, No. 220 / Wednesday, November 15, 2006 / Rules and Regulations)

I call your attention to a situation that has specific impact upon many public and private agencies and their ability to communicate in emergencies, and to the individuals of the amateur radio service. I urge your prompt action to correct it.

In an attempt to expand one mode of operation, Single Sideband (voice), the FCC "inadvertently" eliminated Part 97.221 which allows operations under "local or remote control," 97.221 c(2), which includes Winlink 2000 operations on 80 meters, which is a frequency used to transmit from zero to 1,000 miles. This will have a devastating impact on the ability of this system to function, anywhere and at anytime, within the United States.

More importantly, in an attempt to change the definition of "image" or "FAX," they "inadvertently" redefined data to include J2D, which has nothing to do with their intent, and as a result, killed any and all of the advanced modes of operation for digital communications developed over the last 10 years. This, of course, included Winlink 2000 and the Factor 3 protocol as well as many other protocols.

The results of these "inadvertent errors" are horrific, and will have a major negative impact toward the safety and well-being of over 11,000 daily users of the Winlink system, including the government and civil agencies who depend on Winlink 2000 for last resort emergency communications.

The enclosed letter was sent to Congressman Bilbray, Senators, Feinstein and Boxer for their support in resolving this issue.

CC: William Cross, FCC, Chris Imlay, Council for ARRL

Tom Lafleur, KA6IQA
Winlink Development Team
(858) 759-9692
(858) 759-9693 fax
lafleur@lafleur.us

November 22, 2006

04-140

Congressman Brian Bilbray

Urgent assistance requested regarding FCC R&O of November 15, 2006

Dear Congressman Bilbray:

I am writing to you as a constituent involved in development of emergency communications system in California and the USA. The FCC is about to implement a new rule that will severely impede the ability of the nation's ham radio operators to provide emergency communications support during large scale national emergencies like Katrina or future terrorist attacks.

Since you are involved with many efforts in dealing with Department of Homeland Security I am asking you to intervene in this matter. The FCC staff has admitted that the change in the rule implement in the Rule and Order was a mistake but has done nothing to correct it prior to the release of the FCC Rule and Order. This change if un-corrected will go into effect on December 15 and will take months and perhaps years to undo unless you intervene with the members of the Commission. If it is not changed hundreds of thousands of dollars of Homeland Security funds that have been allocated for emergency communication will have been wasted.

This is a technical issue but it can be explained quite easily in layman's language. The Winlink 2000 communications network, developed, funded and supported entirely by volunteers, links long range shortwave radios system to the internet, providing access to critical communication resources during an emergency. This system has gained such credibility with USDHS that it is installing its own Winlink 2000 Server to supplement the three already in service around the world. Many thousands of DHS dollars have gone to states and local communities, to purchase the specialized equipment needed to access the WinLink 2000 system. WinLink 2000 is also routinely used by the U.S. Coast Guard to request help from ham operators in locating ships lost on the high seas.

Winlink 2000 was singled out for praise by the "Failure of Initiative" report by the Special Bipartisan Committee that investigated the response to Katrina.

"Additionally, the NCS coordinated the frequencies used by the nearly 1,000 Amateur Radio Emergency Services (ARES) volunteers across the nation who served in the Katrina stricken area providing communications for government agencies, the Red Cross and the Salvation Army. Emergency communications were conducted not only by voice, but also by high-speed data transmissions using state-of-the art digital communications software known as Winlink 2000. In Mississippi, FEMA dispatched Amateur Radio operators to hospitals, evacuation centers, and county EOCs to send emergency messaging 24 hours a day." (page 177)

If this new FCC rule goes into effect all that money will have been wasted.

I ask that you contact FCC Chairman Mr. Kevin J. Martin specifically with regard to the Federal Communications Commission Report and Order (R&O) in the so-called "Omnibus"

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Amateur Radio proceeding, WT Docket 04-140 (FCC 06-149) , a revised version of which appeared in the Federal Register on November 15. The changes in the R&O will take effect Friday December 15, at 12:01 AM EST, 30 days after its publication.

The effected FCC rules are 47 CFR Parts 1, 2, and 97 in the Report and Order [WT Docket No. 04-140; FCC 06-149] (66460 Federal Register / Vol. 71, No. 220/ Wednesday, November 15, 2006 / Rules and Regulations).(http://hraunfoss.fcc.gov/edocs_public/attachmatch/FCC-06-149A1.pdf).

This change affects the data emission segment of the amateur bands so as to restrict this area to emissions of a bandwidth of 500Hz or less. In doing so the FCC staff has ADMITTEDLY, in an attempt to change the definition of “image” from analog to “Data,” inadvertently eliminated the use of the Pactor 3 data transmission protocol (J2D) used by the WinLink system, because this protocol has a higher bandwidth of 2400Hz. **It is essential that the FCC rules be changed to state specifically that protocol J2D is permitted on all Amateur Radio Service bands below 30MHz.**

If you need additional information feel free to contact me at anytime at (858) 759-9692 or Mr. Steve Waterman at (615) 665-0952, k4cjsx@comcast.net. Mr. Waterman is the “Network Administrator” of the Winlink 2000 system. Mr. William Cross at the FCC is knowledgeable on the issues. William.Cross@fcc.gov, (202) 418 0691. Also you may want to speak with Congressman Mike Ross who is a ham radio operator and has knowledge of these issues.

One can only imagine the tragic consequences of learning the valuable lessons of Katrina only to eliminate the very software and resource values cited in the report that contributed to saving lives. A mass casualty event that would follow without this capability would be difficult to explain in the next Congressional Investigation. I am sure that, with your assistance, this small technicality can be averted

Thank you Congressman Bilbray for your attention to this matter and for your excellent service to our country.

Yours Sincerely,

Thomas R Lafleur
lafleur@lafleur.us
KA6IQA
WinLink Development Team
Box 3029
Rancho Santa Fe, CA 92067
(858) 759-9692

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AVG certification

No virus found in this outgoing message.

Checked by AVG Free Edition.

Version: 7.1.409 / Virus Database: 268.14.10/541 - Release Date: 11/20/2006

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04-140

Sandralyn Bailey

From: SAhlbom [sahlbom@earthlink.net]
Sent: Friday, November 17, 2006 7:11 AM
To: Deborah Tate; Jonathon Adelstein - FCC; Kevin Martin; Michael Copps; Robert McDowell; PSHSInfo
Subject: URGENT - FCC Ruling Mistake Impacts Emergency Communication Networks on 12/15/06

Federal Communications Commission
Office of the Secretary

Ref: FCC R&O WT Docket 04-140 (FCC 06-149)

The FCC has passed a Report and Order for the new Omnibus rules affecting Part 97 Amateur Radio communication that "inadvertently" shuts down an important part of the Amateur Radio emergency messaging network, effective 12/15/06. It appears that this was an "oversight", but this mistake was allowed into the official R&O release in the Federal Register, despite assurances that the mistake would be corrected.

The change in band plan eliminates digital transmissions exceeding 500 Hertz bandwidth below 30 MHz. This prevents using various protocols such as PACTOR 3, which are the core of the Amateur Radio high speed digital messaging system that is a key element of emergency communications supporting NRP, NIMS and ICS operations. This system has been developed with funding support from national, state and local governments in response to a need for accurate and timely communications required by the National Response Plan.

I am a member of the Chester County PA ARES / RACES organization that supports the Emergency Operations Center of the Chester County Department of Emergency Services. We have implemented systems using PACTOR 3 to provide the communication links necessary to support message traffic volume as required to react to Limerick and Peach Bottom nuclear reactor drills and natural disasters.

This FCC ruling will set us back 10 years and leave us unprepared to meet public needs. Please notify the FCC that this ruling needs to be amended before 12/15/06.

Thank you for your assistance.

Steve Ahlbom, AB3EG
113 Cloverly Lane
West Chester, PA 19380-3875

Cell: 610-733-5059

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04-140

SandraLyn Bailey

From: Steve Schroder [ki0ky@arll.net]
Sent: Thursday, November 16, 2006 8:51 PM
To: dtaylor@tateweb
Subject: Omnibus Amateur Radio R&O

Federal Communications Commission
Office of the Secretary

Commissioner Tate,

I am writing to express my concerns about the effect that the FCC's Omnibus Amateur Radio R&O (WT docket 04-140(FCC 06-149)) will have on the ability of the Amateur Radio Service to provide improved emergency communications service. The just published R&O eliminates the use of J2D emissions with a bandwidth greater than 500 Hz. This restriction eliminates the use of a mode called Pactor III. Pactor III is finding use as an important tool in emergency communications. It is used in a system called Winlink2000 to send Emails from amateur radio stations. For example, today I used Pactor III to send exercise email messages from a County Health Department flu vaccine clinic to the State Health Department. The flu shot clinic was being used as an practice exercise for a Pandemic Vaccine Clinic scenario. Part of the exercise was the simulation that all conventional phone services were out of action.

After December 15, this emergency communication tool will be lost. Please modify the R&O to retain this capability.

Sincerely,

Steve Schroder

Amateur Radio License KI0KY

Emergency Coordinator for District 25, Colorado Section, Amateur Radio
Emergency Service