

Response to the Rules Changes of Part 95
WT Docket No. 10-119
Federal Communications Commission FCC 10-106

By Joseph L Reynolds III
GMRS CALL: WQGH806
AMATERU RADIO CALL: KA1GDQ

3. Power Limits

15. The Part 95 technical rules also specify power limits and equipment certification requirements²⁶ for transmitters²⁷ used in the Personal Radio Services. We note, however, that the power limits for different Part 95 devices were adopted at different times and are expressed variously as limits on a device's transmitter output power, effective radiated power (ERP), equivalent isotropically radiated power (EIRP), field strength at a certain distance, maximum carrier power, and peak envelope power.²⁸ Compliance is measured using different techniques as well.²⁹ The Commission adopted these power limits to account for how various devices are used. For example, devices with integrated antennas are required to meet an ERP limit, while devices that use external antennas would have to meet a maximum transmitter output power limit

KA1GDQ/WQGH806 COMMENTS:

I believe that a single power output on the Personal Radio Service would be a good idea, however, instead of making it 5 watts, it should be 50 watts output power, with the exception of Portable/handheld units which will be limited to 5 watts. This way it makes it go across the board with the all the Personal Radio Services.

5. Voice Scrambling

19. The FRS, GMRS, and CB Radio Service are shared channel services (i.e., all channels are available to users and users must cooperate in sharing the channels to prevent conflicting communications). To allow users of these services to readily hear, understand, and communicate with each other, our rules generally prohibit "scrambling" of communications in these services. Specifically, the Part 95 emission rules prohibit non-voice emissions in the FRS, GMRS, and CB Radio Service, except to establish or continue voice communications or, for FRS, to transmit certain types of location data (e.g., GPS).³² In addition, the rules prohibit digital modulation or emissions in the CB Radio Service and the GMRS.³³ Further, GMRS and FRS rules require that messages be in plain language, without codes or hidden meanings.³⁴ Not only do these requirements facilitate channel sharing, but they also enable emergency communications if needed.

KA1GDQ/WQGH806 COMMENTS:

Voice Scrambling

I AGREE. I believe you are correct on not allowing scrambling of the GMRS and the FRS band. My main thought of this was for safety and handling emergency traffic. If you are in scrambled modes, you may not hear someone not scrambling their signal who is in distress. Also this will limit the use of these services to be used for illegal activities. If you are on the FRS & GMRS frequencies, all users should have the right to monitor these frequencies and the traffic it is containing. Those who want "PRIVATE COMMUNICATIONS" should obtain radios and licenses for a Business Band that will allow scrambling.

Rules Prohibit Digital Modulation or Emissions

In the GMRS portion only, the use of digital transmission of the users call sign SHOULD be allowed when keying up the radio. This should be voluntary (NOT MANDATORY). This could be used to ID the call sign and if there is an emergency, a user who is in distress and can't talk, but can key the radio's

transmitter by the use of the PTT or an emergency button, and those who have readers can ID the person and triangulate their position, and give it to the proper first responders (Police/Fire/Medical/SAR). Right now there are many business and public service radios that have this function on the transmitters, and will ID the radio (I suggest with full call sign and their unit designation, such as WQGH806P2 for the call of WQGH806 and P2 showing it would be the 2nd Portable under this family license). It will also meet the requirements of Identifying the License of the user, as stated in 95.119.

Allowing Digital use on FRS:

I believe if the “Text Messaging” will be allowed for this service, it should only be used on the FRS ONLY sections of this band. I suggest using FRS Channel 14 & 15 for this purpose, and have the manufacturers be able to let the users determine which channel can be used. Ch 14 & 15 will also allow voice as well as data (text) communications.

General Mobile Radio Service

1. Station Licensing

27. In view of the foregoing, we propose to eliminate the requirement for individual station licenses in the GMRS. Instead, we would, by rule, authorize operation of these stations without individual licenses. In addition, if GMRS is licensed by rule, GMRS operators would no longer receive call signs for their radios and we would, therefore, eliminate the station identification requirements in current section 95.119. As of the day the revised rules became effective, all existing GMRS licenses would be void. In addition, all pending applications for such licenses, and all applications for such licenses subsequently received, would result in no official Commission action. We seek comment on the proposal to license GMRS by rule, including whether all classes of GMRS stations should be licensed by rule or only handheld portable units. Additionally, we seek comment on the pros and cons of licensing GMRS by rule versus maintaining the individual licensing requirement. Additionally, if we only license certain classes of GMRS by rule, should we maintain the station identification requirements for GMRS?⁵⁷

28. Alternatively, if we were to maintain the individual licensing requirement for all or some types of GMRS operations, we propose to extend the GMRS license term from five⁵⁸ to ten years, to conform with most other wireless services, where the license terms have been extended from five to ten years.⁵⁹ Extending GMRS license terms to ten years would decrease the administrative burden on both the general public and the Commission without, we believe, any adverse impact.⁶⁰ It also would promote standardization of general licensing rules and streamlining of administrative requirements. We seek comment on the proposal to extend the license term from five to ten years if the individual licensing requirement is maintained for GMRS.

KAIGDO/WQGH806 COMMENTS:

My view on the station licensing is as follow.

- 1) *Extend the licenses to the 10yr mark to equal the other services such as Amateur Radio.*
- 2) *Do NOT get rid of the licensing, however LOWER the license fee. This could all be done on line and the fee should not Exceed \$50, but if you can have a FREE license, and just have the computers automatically generate a call sign and it could be posted with in 48 hrs. This could be done on line and no manpower working paperwork would be needed.*
- 3) *With the licensing, a 10-25 Question, open book, multiple choice online-exam on the rules and operations of GMRS, to be given online, when going through the license process, (even a read a section, next page is 2-3 question per the previous page, read the next page, answer 2-3 other questions) . This will give a the applicant a better understanding of the rules.*
- 4) *Allow any Licensed Amateur Radio Operator to use the GMRS Frequencies by*

using his HAM Call sign. Because many hams in the Cape Cod/Boston Area and the Northern California areas lost the 440-450 band because of the Pave Paws / USAF/DOD projects, we lost the shared rights to the band. This will allow Hams to talk to GMRS operators Legally and remove the work to the FCC on handing out 2 licenses to Hams that would like to also use GMRS. Or let the Ham Operator obtain a GMRS License for FREE, online, and even have the ability to add it to his 605 form when applying for his new, renew or upgraded license.

Without licensing, there would be complete chaos on the bands. Many of moved from CB to GMRS because of the static on CB, the Skywave/"Skip" conditions by the atmosphere alone make it difficult to talk to someone a mile away, but easier to talk to someone 150-300 miles away using a mobile antenna or a vertical base antenna, with no extra power. The FM on GMRS make it much cleaner to talk and get business done.

With the GMRS there is an understanding that most people, unless a Repeater Owner actually gives out unit numbers, that you use your last 3 (digits) of your call sign (i.e. my call is WQGH 806, when I call someone they will say 806 from 231. When we are done talking or the conversation exceeds 15 (I usually use 10 because of the habit with amateur radio) I will say WQGH 806 CLEAR. It makes it easier and you have an idea of the other persons call sign.

Even though the FRS users do use the GMRS side of the radio (basically the repeater pairs) do not usually interfere with the repeaters, but all you have to do is ask them to move down to the channels between 1-14, and most will.

2. Eligibility

29. Under the current GMRS rules, only individuals who are 18 or older are eligible to obtain a GMRS license.⁶¹ An individual's family members of all ages may operate GMRS stations and units *within a licensed system.*⁶² Given that there is no age restriction on using radios in the other Personal Radio Services, we see no reason why, if we maintain the GMRS licensing requirement, younger individuals should be prohibited from operating a GMRS device or obtaining their own GMRS license. Therefore, we see little benefit to maintaining a minimum age requirement for GMRS. We seek comment on this proposal.

KAIGDO/WQGH806 COMMENTS:

1. *I can see lowering the limit to 16, or getting rid of it completely, as long as an ADULT signs for the minor. You maybe better off keeping it 18, this way if there is infringements, it is easier to deal with an adult than a minor to fix the error. The error / issue might have been accidental, but a minor might feel more defensive than an adult.*
2. *If a child wants to use it, its better for the parent/guardian to obtain the license for the entire family*
- 3.

3. GMRS Portable Devices, Mobile Operations, Repeaters

Portable Devices

31. Currently, there are no power limits specifically addressing portable GMRS radios. Instead, such devices fall under the GMRS mobile station category and are subject only to the 50 watts ERP limit established for that category. This has allowed manufacture of handheld GMRS radios that operate between one and five watts ERP. Given the increasing popularity of portable GMRS radios and the ubiquitous marketing of such devices, we believe the public interest would be served by establishing specific power rules for portable GMRS devices. In addition, because GMRS portable devices are, for the

most part, used by the general public, we believe the public interest would be served by no longer categorically excluding portable GMRS devices from routine evaluation of human RF exposure.

32. We propose to prohibit GMRS portable devices from operating at more than two watts ERP. This is the same power limit that applies to portable units used in licensed low power industrial / business pool Part 90 land mobile operations in the 450-470 MHz range (the same frequency range as GMRS).⁶⁵ A review of equipment authorization applications for portable GMRS units reveals that many units already operate at less than two watts ERP.⁶⁶ This power limit should be adequate to ensure the devices meet the RF exposure limit for the general public. We also note that it will promote economies of scale, because Canada's license-exempt radios operating in this band are limited to two watts ERP.⁶⁷ We seek comment on all aspects of this proposal.

KAIGDQ/WQGH806 COMMENTS:

1. *Licensed Portables should be allowed to use 5 Watts of power. This will make it consistent with the amateur portables on the 440mhz band.*
2. *Most Licensed GMRS Operators don't use the generic "Bubble Pack" Radios. They use the older portables picked up at flea markets or they purchase new commercial radios that are rated at 5 watts.*
3. *I do understand this is for the safety of the user, and that is why I am not saying to bring it up to 10 Watts.*
4. *Manufactures can produce 2-watt versions to be used on the FRS bands which license-exempt as long as they DO NOT do Repeater Operations.*

34. We also seek comment on power limits for other classes of GMRS operations. Most GMRS station classes currently may transmit with up to 50 watts output power.⁷⁴ This is a relatively high power for stations that are not coordinated, and with the use of gain antennas, the actual radiated power could be much higher. Given that GMRS licenses are not issued on a coordinated or exclusive use basis, should we continue to permit 50-watt operations? Should the existing station classes and power limits be maintained? In this regard, we request comment on whether we should reduce power limits or establish antenna height limits to increase frequency reuse for, and minimize interference to, GMRS communications. We recognize that the authorized level of station power and antenna height may impact spectrum efficiency. Furthermore, we note that the personal communications environment has evolved substantially since the Commission adopted the rules allowing repeater operation for GMRS. For example, most wide-area personal communication needs are now met by commercial communication providers.⁷⁵ We seek comment on whether repeater and base station operations are still needed in the GMRS given the availability of commercial alternatives that allow for more efficient use of the spectrum.

35. Furthermore, in order to account for the way a base station's power is measured, we propose to change the power limit for GMRS small base stations to five watts transmitter output power, instead of five watts ERP. This approach would ease the accuracy of power measurement and would allow for the use of directional antennas to focus the signal's energy in the desired direction. We seek comment on the proposal to change the power limit for GMRS small base stations to five watts transmitter power and on whether we should also adopt antenna limitations for such stations.

KAIGDQ/WQGH806 COMMENTS:

1. *As for mobile operations, it should be maximum 50 Watts Output power. Most commercial Radios for the 450-480 band are at 35-45 Watts anyways. After Power line loss, even if they are using low loss cables, they are below that, unless if they are using a high dB gain antenna.*
2. *"Small Base Stations" should be able to run the 50 watts of output power because of the radio's that are purchased again are made for that. Many have the LOW setting*

though, and can be used, but in case of someone calling for help, on a direct frequency, or a far off repeater, the extra wattage would help in connecting to that person in distress and with out the extra power, could jeopardize a life or limb.

3. *Channel 1 on the FRS/GMRS shared channel, is being tested as an EMERGENCY or Calling / Distress channel. Even though I do agree with this channel, the GMRS operators running the extra power can again contact these people calling for help wwho are using the FRS radios and get through the junk if there is other traffic which others may not hear the distress until they hear the 50 watt station.*
4. *REPEATER OPERATION: Repeater Operations should stay in the "GMRS" band and the power should 50 Watts output power. This will enhance the use to the band, to Licensed Operators, who will now how to properly operate the band.*

5. Section 95.29(g)

- *KAIGDQ/WQGH806 COMMENTS*
- *Basically remove this off the ruling. It makes no sense anyways.*

Garmin International, Inc. Petition for Rule making

39. *In 2003, the Commission, at the request of Garmin International, Inc. (Garmin), a designer and manufacturer of electronic devices, amended Part 95 to permit the transmission of Global Positioning System (GPS)⁷⁹ location information and user-generated text messages on certain FRS channels.⁸⁰ On July 22, 2003, Garmin filed a petition for rulemaking requesting that the Commission amend Part 95 to permit such transmissions on the 462 MHz GMRS channels.⁸¹ Garmin requests that we amend sections 95.29(f)(1),⁸² 95.119(a)(1),⁸³ 95.181,⁸⁴ 95.183(a)(4),⁸⁵ 95.631(a), (e), and (f),⁸⁶ and 95.633(a)⁸⁷ to authorize the transmission of GPS location information and text messaging using emission type F2D⁸⁸ in a digital data burst of not more than one second. The digital transmissions (data or text) would have basically the same limitations as those applicable to the transmission of GPS data and text messaging in the FRS.⁸⁹*

40. *Garmin notes that the Commission has already acknowledged the benefits (e.g., the ability to locate lost or injured persons) of allowing such transmissions on FRS spectrum, and argues that these benefits will be even greater in the GMRS because the higher power permitted in this service allows coverage over a larger area.⁹⁰ Garmin contends that the safety of life and property benefits associated with allowing the transmission of GPS and text information can be obtained while still maintaining the integrity of GMRS and without causing interference*

KAIGDQ/WQGH806 COMMENTS

I go back to my comments earlier in this brief about text messaging. The GPS Coordinates should be allowed but have then on either FRS Channel 13 or 14. If there is an emergency, and the location has to be sent out, then when you hit an emergency button it will be sent over Channel 1, a 3-second burst every 20 seconds. This burst will give the coordinates of the radio.

Family Radio Service

Combination Radios

*With the increasing popularity of FRS radios, some manufacturers have begun to market radios that can be used by consumers to access FRS frequencies as well as frequencies in other services (i.e., the frequencies are accessible using front panel controls). For example, several manufacturers market radios that operate on both FRS and GMRS frequencies.¹⁰⁶ While we recognize the convenience of these combination radios, we are concerned that manufacturers are starting to include FRS frequencies in radios that include VHF marine frequencies.¹⁰⁷ FRS combination radios that include VHF marine ***in the radio, a possible interference problem to marine distress, safety or navigation communications on*** Channels 16 and 70 could arise.¹⁰⁹ Allowing VHF marine frequencies to be front panel accessible on*

radios manufactured and mass marketed to the American public for personal communications could result in disruptions to the United States Coast Guard during distress calls or confusion between communications by the general public and actual maritime distress calls. Additionally, widespread capability to transmit on these distress frequencies could result in increased hoax mayday calls.

KAIGDQ/WQGH806 COMMENTS

Have had a Marine License (when it was req'd) in the past, and the use of Marine Radio's to contact the USCG, I believe that the combination of the FRS/MARINE would not be a good idea for the Marine Community. Also if they are on the water, the boater should have a good, solid, portable, but better yet, a dual power (High/ Low) radio, not just a portable. If they boater wants to use FRS on the water, they should be able to, but the radio's are less expensive than what they were before and that they should just purchase the bubble pack FRS/GMRS. This also gives them an alternative in case one radio is dead, they can go to the second radio.

D. Citizens Band Radio Service

1. CB Hands-Free Microphones

49. On December 17, 2003, Omnitronics, L.L.C. (Omnitronics), a manufacturer of communications equipment, filed a petition for rulemaking requesting that we amend Part 95 to authorize the manufacture, sale, and use of wireless microphones to permit hands-free operation of CB transmitters.¹¹⁶ Specifically, Omnitronics proposes that we amend the rules “to (i) provide that authorized wireless microphones in the Citizens Band Radio Service (‘CB Hands-Free Microphones’) may be used with authorized CB transmitters, (ii) allow manufacturers to obtain stand-alone equipment authorizations for CB Hands-Free Microphones designed and marketed as after market add-ons, and (iii) set forth technical standards for CB Hands-Free Microphones.”¹¹⁷ Omnitronics also requests that we amend section 95.419 to provide that use of CB hands-free microphones does not constitute remote control.¹¹⁸

50. Omnitronics contends that its proposed changes are necessary because the Commission’s current rules frustrate the development and use of hands-free technology by CB users,¹¹⁹ and that the proposed changes would not undermine the purpose of section 95.419. It notes that section 95.419(c) already provides that direct mechanical control or electrical control by wire from some point on the same premises, craft, or vehicle as the CB transmitter is not considered remote control.¹²⁰ Omnitronics states that its proposed parameters would limit use of CB hands-free microphones to the immediate vicinity of the CB transmitter, just as if a direct wire were used.¹²¹

51. Omnitronics also proposes that we amend section 95.607 to exempt CB hands-free these devices, and that competition among manufacturers would provide the public with greater choices and lower prices for this technology, if manufacturers other than the CB transmitter manufacturer may obtain equipment authorization.¹²³ Omnitronics also states that CB transmitter manufacturers have “standardized the use of open external connectors to allow CB microphones to connect with the CB transmitter” so that no changes to the CB transmitter are necessary to add a microphone, and such microphones cannot affect the transmission characteristics of a CB transmitter.¹²⁴

52. Finally, Omnitronics contends that the proposed rule changes serve the public interest, particularly in facilitating safer operation of CB transmitters by the long-haul trucking community.¹²⁵ It argues that use of hands-free microphones will enhance road safety.¹²⁶ Additionally, to the extent that States prohibit the use of hand-held wireless devices in motor vehicles, hands-free microphones may be the only means to ensure that some CB users can continue to operate.¹²⁷

53. We agree with Omnitronics that the rule sections at issue were not specifically intended to prohibit the use of wireless hands-free microphones.¹²⁸ Accordingly, we propose to amend Part 95 to make it clear that use of wireless hands-free microphones with CB transceivers is not considered to be remote control. Operation of such hands-free microphones, however, will be limited to the immediate vicinity of the CB transmitter. To effect such a limit, we propose to allow only hands-free microphones that operate under Part 15 of our rules. We seek comment on whether the operating range should be constrained by means of a field strength limit specifically for CB wireless hands-free microphones, for example, a fundamental emission level of one thousand $\mu\text{V/m}$ (microvolts/meter), as measured at three

meters based on measuring equipment using a quasi-peak detector function.¹²⁹ Wireless microphones used with CB transmitters would have to comply fully with Part 15 of our rules,¹³⁰ and must not change any of the operating parameters of the CB transmitter or affect the CB transmission. We seek comment on whether the one thousand $\mu\text{V}/\text{m}$ emission limit proposed for Part 15 is appropriate. Additionally, we seek comment as to whether we should allow only the CB transmitter manufacturer to obtain certification for a CB hands-free microphone or alternatively, as Omnitronic suggests, to permit separate equipment authorizations for CB hands-free microphones. Additionally, we seek comment on whether we should allow hands-free devices that are widely available for cellular telephones used in vehicles to be used with CB transceivers

KAIGDO/WQGH806 COMMENTS:

Simply put, it is safer if the CB users can use bluetooth technology for the microphones and that should be allowed. It does not constitute remote control, and even if it did, it would be safer for all

Review of Operating Rule

55. We note that section 95.416 (CB Rule 16) provides that CB communications must be limited to the minimum practical time, that each CB station must limit its conversations to no more than five continuous minutes, and that after each conversation, CB stations must not transmit again for at least one minute.¹³² These restrictions were adopted long before the introduction, and now pervasive use, of wireless telephony, which has effectively relieved the CB service of congestion. Similarly, the GMRS prohibits continuous or uninterrupted transmissions¹³³ and are generally required to share channels to reduce interference.¹³⁴ The FRS rules state that the user must share each channel with other users and no channel is available for private or exclusive use.¹³⁵ Given that these three services are basically used for the same purpose, should we apply the same general channel sharing requirements across all the services or does CB continue to need specific limits on the length of communications and a required pause before initiating a new conversation? Does there continue to be congestion in the CB band or is the rule needed due to interference concerns with uses outside the CB band? We seek comment on whether to limit the duration of any single continuous transmission to prevent the use of CB radios as broadcast stations, transmitting continuously for long periods and thereby preventing others from using a channel. If they do favor such a limit, commenters should address how long a continuous transmission the rule should allow. We also seek comment on whether the Commission should amend or eliminate section 95.413(a)(6), which prohibits the transmission of music, whistling, sound effects or any material to amuse or entertain, and section 95.413(a)(7), which prohibits the transmission of any sound effect solely to attract attention.¹³⁶ Obviously, some of these types of transmissions could be detrimental if not kept in check, but would some allowances be reasonable and consistent with how we treat other Part 95 Services? If the Commission amends or eliminates such restrictions, should it retain a time limit on continuous transmissions?

56. Section 95.607 specifies certain types of design modifications to certificated CB transmitters that would not be permissive, and would in fact require the manufacturer holding the certification to seek written FCC permission prior to incorporating such changes in current production.¹³⁷ This section essentially elaborates on the general requirement of section 2.932, regarding changes to certificated equipment.¹³⁸ To avoid possible confusion from such duplication, we propose to remove section 95.607 and consolidate this requirement with similar requirements for other Personal Radio Services into section 95.33, which will contain a general reference to the Part 2 equipment certification rules, an outline of the equipment certification process, and any special certification requirements for Personal Radio Services. While section 95.607 and the new section 95.33 are primarily intended for manufacturers of CB equipment that hold the FCC equipment authorization, we observe that interference to other services is frequently caused by the use of CB equipment that has been modified by the CB operator or persons other than the manufacturer to operate on unauthorized frequencies or increase power beyond what is allowed.

To emphasize that CB operators are not permitted to change the technical operating parameters of their equipment, or to operate equipment that has been so modified, we will repeat the prohibition in section 95.311 (What equipment may I use at my CB station?) and also point to the administrative and technical subparts (Subpart A and B of Part 95, respectively) in section 95.301 (Scope). We also seek comment on whether CB or other Part 95 Services need special equipment certification provisions or other changes to the rules to ensure that only proper equipment is used.

57. Section 95.413(a)(9) prohibits communications or attempted communications with any CB station located more than 250 kilometers (155.3 miles) away.¹³⁹ The purpose of this rule is to ban CB radio communications using sky wave propagation, because the Commission intended CB radio to be used for short-distance communications.¹⁴⁰ CB radios operate in the upper portion of the high frequency (HF) band, where radio wave propagation includes two modes, direct and sky wave. Direct waves move along the earth's surface, while sky waves reach the ionosphere and then reflect (bend) downward reaching long distances. CB stations can communicate by direct waves with other CB stations within approximately 15 miles at all times, and also with stations up to several hundred miles away via sky wave propagation, provided solar conditions permit.¹⁴¹ When conditions for sky wave propagation are favorable, it may actually be easier to communicate with distant stations than closer ones. This presents a unique problem with allowing a "commons" band regulatory structure¹⁴² in the HF band that allows the capability to transmit over long distances. Section 95.413(a)(9) can be a difficult rule to enforce because regular CB radios are capable of communicating over hundreds of miles without any attempts to modify their operations. Nevertheless, this ability to communicate over long distances has tempted some to use illegal linear amplifiers and directional antennas to see how far they can communicate. Such operations can result in harmful interference to television operations, as well as other services in the HF band. Therefore, we seek comment on how best to deal with this natural phenomenon. Amplifiers for CB stations are already illegal, but should we consider prohibiting directional antennas for CB operations in order to facilitate its intended use for short range communications? Should we consider power reductions for the CB Service? Is there harm in allowing CB operators to communicate in sky wave mode, or would such an allowance tempt the use of illegal amplifiers which cause interference? We seek comment on how best to deal with section 95.413(a)(9) and other challenges in permitting a "commons" band regulatory structure in the HF band.¹⁴³

KAIGDQ/WQGH806 COMMENTS:

1. Power Requirements: 50 watts output power

- 1. I believe the power of the CB should be 50 Watts output power to make it with the rest of the Personal Radio Services. Also many are already using illegal power and it is too hard to enforce, so this is the few times of "If you can't beat them, join them or let them win" and boost the power output to 50 Watts. It is just too hard to enforce right now and it would ease enforcement if you allow them to use 50 watts output power. There will be lower interference with TV because most of the US has either cable or satellite TV anyways.*
- 2. Antenna: Keep the use of the directional antenna. It actually has come in very handy in the past to assist in locating a lost mariners and other people.*
- 3. Remove the restriction of the distance you can talk. Because of atmospheric conditions, you cannot change that and it is going to happen. The use of CB is now being used as a recreation not for business anymore. Those who want to run a business get a business band VHF or UHF license where they are assigned frequencies (or frequency) to operate on. The atmospheric conditions sometimes make it harder to talk 1 miles never mind hear anyone 15 miles away, but you can hear and talk to someone who is much stronger in your receiver, and they are well over 150 miles away.*

OTHER POINTS I WOULD LIKE TO BRING UP.

- 1) LICENSED AMATEUR RADIO OPERATORS SHOULD BE ALLOWED TO MODIFY THEIR RADIOS TO OPERATE LEGALLY ON THE GMRS BANDS. THIS WILL COME IN HANDY WHEN WORKING DURING EMERGENCY COMMUNICAITON (E-COM) SITUATIONS AND MORE HAMS CAN MONITOR AND REPSOND TO THOSE WHO ARE IN NEED USING THE GMRS/FRS RADIO SYSTEMS*
- 2) HAMS SHOULD BE ALLOWED TO USE THEIR EXISTING HF RADIOS TO OPERATE IN THE FORMER 11METER (CB) BAND. THEY WOULD HAVE TO BRING THEIR POWER DOWN TO 50 WATTS (IF ACCEPTED) OR THE 5 WATTS WHICH IS THE PRESENT RULING ON POWER FOR THE 11 METER BAND. AGAIN THIS WOULD MAKE IT EASIER TO ASSIST THOSE IN TROUBLE ON THE CB BAND AND GET THEM HELP.*

In closing I would like to thank the board on reading my proposal. I hope you will take this into consideration. I have been a ham radio operator for over 30yrs, I have had my GMRS now for a short 2 years now, but I have held it in the past. I believe my recommendations will assist in growth of the bands, and cooperation between the Amateur and the GMRS & CB Band.

This will allow easier enforcement for the FCC and easier paperwork, with still having license requirements for those who want to operate in these bands.

Respectively Submitted

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