

6009 Woodvale Drive
Helena, AL 35080

June 29, 2010

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: FCC PUBLIC NOTICE AND ET DOCKET NO. 10-123

Dear Madame Secretary:

I am writing to comment on the proposed reallocation of the 1675-1710 MHz frequency band now being used for meteorological services to broadband use.

I strongly disagree with this idea and encourage the FCC and other commercial uses seek broadband use elsewhere.

As a private citizen involved in SKYWARN and amateur radio, my EMWIN downlink installation supports the distribution of National Weather Service (NWS) information specifically warning products to amateur radio and emergency services in Central Alabama. My downlink station has been in operation for nearly 10 years and allows immediate distribution to SKYWARN participants across North and Central Alabama including the Alabama Emergency Response Team (ALERT) which works closely with the local NWS office in Birmingham, AL.

Here are my responses to the specific items in Docket 10-123 that will affect the operation of my reception of the EMWIN signal:

1. A description of the utility of the 1675-1710 MHz band for wireless broadband services, including any pairing, band plan, or other licensing approaches that would maximize this utility;

I see no use for broadband services, here.

2. Identity of the non-federal entities accessing the services operating in the 1675-1710 MHz band;

Non-federal entities which make use of the 1675-1710 MHz band include but is not limited to:

- Local amateur radio civil emergency-related groups and organizations across the country - such as ARES and RACES and the ALabama Emergency Response Team (ALERT). ALERT is the local interface to the Birmingham NWS office in Calera, AL, providing weather reporting support to the NWS warning program.

- Private individuals - approximately 25 - who subscribe to the warning distribution list served by the EMWIN station I operate.

3. A description of the purpose of such use (i.e., the equipment is used to support TV weather forecasting or for conducting university research);

I use the data to disseminate weather-, disaster-, civil-, and national-emergency information to the local general public in North and Central Alabama for free as a public service, especially for those who could not afford commercial services, which are often slower and come at appreciable cost.

The data is distributed using various means - to E-mail, FAX, pager, cellphone, PDA, list groups, and even to web pages, Twitter, and Facebook.

Users include teachers; TV and newspaper reporters; TV meteorologists; police and fire/rescue workers; emergency managers; University students, staff, and employees; pilots; and others.

4. Which portions of the 1675-1710 MHz band are used;

Using the GOES EMWIN downlink frequency of 1692.7 MHz.

5. How often the service is used (e.g., every day, scheduled times of day, duration, etc.);

All services make continuous use of the EMWIN data on a 24-hour-a-day, seven-day-a-week basis.

6. An estimate of the current investment in wireless equipment, including when it was obtained and put into use;

Approximately \$4000.00 counting downlink reception equipment, cabling, and computer hardware and software.

7. A description of whether and how the information and services currently accessed can be obtained from other means; and if so, the anticipated costs and

timeframes for implementing any alternatives;

There is currently no alternative means of reception should the 1675-1710 MHz downlink band be removed from our use. The required purchase of completely different equipment would be prohibitive and beyond the capability of this volunteer effort.

8. Confirmation that, if the information currently available from the meteorological satellite service were received at only a few receive sites and distributed via terrestrial services, this would be a functionally equivalent substitute for the direct reception of the satellite and radiosonde services;

I cannot confirm this assertion.

9. Any other information interested parties would like to identify regarding use of the meteorological satellite and radiosonde services.

EMWIN's IMPORTANCE

1) EMWIN is designed to bring speedy bulletins to Emergency Managers and storm spotters to aid in making decisions during times of severe weather, natural disasters, or civil or national emergencies.

2) EMWIN provides users a very important lead time - even over the NOAA NWR (NOAA Weather Radio) system, allowing emergency managers and others to prepare and make critical decisions in the face of approaching weather emergencies.

3) EMWIN is now used by thousands of EMAs across the United States and in other countries. In places like the Pacific islands, EMWIN is the only source of heads-up information to hurricanes and other weather emergencies. It is a fact that the US government recently GIFTED an EMWIN system to earthquake ravaged Haiti to help them in their time of need.

4) Bulletins provided by EMWIN include not just weather bulletins, but bulletins regarding civil emergencies (Amber Alerts, 911 telephone outages, law enforcement emergencies, hazmat emergencies, etc.), civil defense emergencies (national attack warnings, fallout predictions, etc.), geological hazards (earthquakes, tsunamis), and even space weather (solar flares, geomagnetic storm warnings, etc.).

I cannot understand anyone wishing to second guess the need for or the usefulness of the EMWIN downlink frequencies. The government actually needs MORE systems such as this that can be utilized during times of emergency as a quick means of getting needed information to the public without delay.

The 1675-1710 MHz band is so relatively small and it seems likely that broadband interests can find another band less important to emergency and civil communications than the EMWIN downlink band which is already used so effectively in weather information distribution.

I thank you very much for your time and consideration in this matter, and I sincerely hope that the outpouring of responses illustrates the tremendous reliance on these frequencies and the tremendous setback weather operations around the world would face at the loss of these capabilities.

Sincerely,

A handwritten signature in black ink, reading "Brian E. Peters". The signature is written in a cursive style with a prominent initial "B" and a long horizontal stroke extending to the right.

Brian E. Peters
Meteorologist