

Before the Federal Communications Commission  
Washington, D.C. 20554

In the Matter of: )  
)  
Review of the Commission's Part 95 Personal ) WT Docket No. 10-119  
Radio Services Rules )

My name is Osmar Kusumo with a GMRS call sign of WQKV660. I am a recent GMRS licensee who initially purchased 5-watt ERP consumer grade GMRS / FRS "bubble pack" radio for my family hiking trip. It was the licensing requirement that entice me to purchase better set of professional grade-Part 95 certified portable radio and embrace the privilege of having powerful shared-personal radio service. These include embracing the FCC guideline, technical rules, etiquette and everything related to GMRS usage of repeater station. I am now in the early stage of repeater building but hesitant to invest further for my community and family if the changes in the NPRM become effective in the near future.

I have reviewed the above stated Notice of Proposed Rule Making (NPRM) released on June 7, 2010. After careful review of the NPRM, I am uneasy about some of the probable outcomes of such proposed changes. While I support and respect the commission's needs to administratively streamline services within Part 95, I believe that this need can be met while still addressing most, if not all, of the concerns mentioned on these comments.

**Comments on specific proposals**

I am for the extending the term of GMRS licenses from five to 10 years instead of the elimination of GMRS licenses (license by rule). It is such a privilege as citizen to be given sliver of the radio spectrum for reliable and personal communication where the shared use of paired frequencies is mostly well respected and adhered to; specifically, the self-coordination between repeater owners and their users to avoid interference. I express doubts as to the continuation of this selfless effort when the license by rule is applied to GMRS especially for repeater station, fixed and mobile base station for the following reasons:

The 8 GMRS only frequencies, the 462 .5500 through .7250, are filled with chatters from businesses in the New York metropolitan area. From self-policing and group discussion exchanging information

of these chatters, we have found that most of them are unlicensed individuals and non-grandfathered businesses using these frequencies for business purpose. It is difficult for any licensed individual and their family to communicate without encountering the interference where the use of CTCSS and DTCSS do not silence them even at a higher squelch level setting. Almost none of them uses their call sign or understands the concept of shared frequency use. Removing the license requirement will likened the GMRS frequencies to CB and FRS radio where businesses will take over any available or sparsely used frequency. The cost saving for businesses for not paying coordination and licensing fee is tremendous in the NYC area. I doubt very much if this is the original intention of the FCC by making GMRS license by rule.

The very notion that businesses are eager to use the GMRS frequencies proves that GMRS is a useful radio service that fosters reliable communication. I urge the FCC to enforce the use of the radio service to avoid it from being dominated by businesses that can easily dominate the limited number of GMRS frequencies for personal use. falling into chaos as we have seen with CB and FRS. I am also willing to pay an extra fee to allow the FCC to extend its enforcement effort.

Most importantly, licensing creates the effect of importance, usefulness and of privilege urging the licensee to find out more about the service and how the service can be best maintained. After all, the licensee is paying for the service and would feel obligated to protect what he or she had paid for. GMRS licensing foster open and transparent use of the service and ease of self-coordination through Internet forums and Internet user groups. As future repeater station operator, I will use the users' call signs as an integral part of the repeater user record. This record will be made available to other affiliate repeater owner in our small GMRS group, Central Jersey radio group. Without users' call sign and licensing record, it will be extremely difficult to track the repeater users in the event of misuse or abuse to the repeater system.

The minimum age requirement to obtain a GMRS license may be eliminated as long as either parents consent and willing to take the responsibility of the minor's action.

GMRS users mostly do not use consumer grade or often called "bubble pack" for communicating using repeater especially in the NYC metropolitan area. Limiting the power of portable or handheld transceiver to 2 Watts, ERP would mean fewer walls to penetrate and less obstruction that the signal can go around. GMRS users are using Part 90/ 95 radios similar to public safety radios where it can be programmed by a personal computer to a lower power.

I support the effort to limit the combination GMRS /FRS consumer grade radio to 2W ERP as to increase the frequency reuse in a densely populated area such as NYC as long as the allowance of commercial grade / public safety type 95 radio use is maintained.

As of to date, there are very few if not none of the manufacturer beside of consumer grade radio that design and market specifically for GMRS with Part 95 certification. Nearly all radios being used by GMRS users are Base, Mobile or Handheld /portable combination Part 90 and Part 95. GMRS service should be distinguished because of its use of repeater to extend its range. The need to use a more sensitive removable antenna is important to receive the sparsely located repeaters. All of the consumer grade radios taut higher transmit ERP up to 5 Watt but its reception due to the fixed antenna is shoddy at best. It is a drain on the battery and waste of frequency that can be used by other users. Whereas part 90 / 95 radios can vary in its transmit power up to 4W ERP and better antenna to receive talk around / simplex messages of the same distance.

Lastly, I would like to emphasize that the “current technologies and the way in which services are being used today” do not reduce the way in which GMRS is being used. Despite of digital PCS, Cellular and other communication device, the need for a reliable analog radio service that extend communication for miles with the use of repeater is indispensable even in metropolitan area such as New York City. Below are snippets of reports from the NYC office of Emergency Management describing the vulnerability of New York communication infrastructure on September 11, 2001 and the Northeast black out rendering communication blackout for most of the NYC area.

“Loss of service at Verizon central offices: Although equipped with backup power generating equipment, which operated appropriately in most Verizon central offices (CO), three Verizon central offices experienced outages of various durations due to failures of generating equipment. These failures resulted in the loss of Verizon CO’s that service Manhattan’s midtown area and the downtown Brooklyn area...due to failed T-1 circuits. Verizon facility has been identified as a critical single point of failure for the City’s 911 system. In the areas serviced by the central offices that experienced outages there was a reduction in cellular capacity, as well as an inability of the public to have inbound and outbound telephone service, which included the ability to dial 911.”

“Overload of cellular network following the emergency: As experienced in previous emergencies, there is a tendency for cellular networks to be overloaded immediately following an emergency situation. The power outage of August 14 was no exception. Throughout the City cellular service was unavailable immediately following the outage. This unavailability caused significant problems for residents, visitors and businesses that were attempting to obtain information about the outage, to reach a safe destination, or in the worst cases to reach emergency services.”

It was the Amateur radio groups and network of GMRS licensees that help coordinate additional resources and relaying the messages to the emergency personnel nearby during these incidents. As many have contributed, GMRS is a personal radio service that complements our modern communication need. As long as the above-mentioned vulnerability exist, the value of a repeater

capable system that are maintained and coordinated by individuals and their families are priceless. Relegating the GMRS service to a short-range consumer grade radios would be a disservice to all of us.

Respectfully submitted,

Osmar Kusumo