

**REPLY COMMENTS TO REPLY COMMENTS OF UNIDEN AMERICA CORPORATION ON THE
PETITION FOR RULEMAKING TO REVISE THE PERSONAL
COMMUNICATION SERVICE RULES**

My name is Mark Pomeroy and I am a licensed GMRS user. I would like to make brief comments on Uniden's comments and my lack of response to certain issues simply means that Uniden is repeating comments on which I have previously commented.

ALLOWANCE OF PRS CHANNELS IN MARINE SERVICE TRANSCEIVERS

“As pointed out by Ross Snyder, combination Part 80 / PRS transceivers make it more likely that consumers can purchase such a device in lieu of a PRS-only device, which would have none of the positive life-and-safety ramifications of such a combination device. It avoids the needless expenditure for two separate radios by knowledgeable (sic) consumers who desire the benefits of both marine band and PRS capability. We agree with Snyder that prohibiting such a device would contravene the public interest.”

I actually investigated this assertion on Uniden's webpage and found that buying a separate FRS/GMRS radio and a marine radio would cost materially the same as a combo radio, so I will assert that knowledgeable consumers will opt for either the lower cost PRS radio or the lower cost marine radio as need dictates or they can buy both.

“We note Mark Pomeroy's objection to and concern regarding combining PRS and Part 80 channels in a single unit. However, we also note that Mr. Pomeroy specifically points out the problem that such devices are intended to avoid, to wit, “Many users gravitate to the clearest channel regardless of FCC intentions (sic).”

I do not understand by what mechanism “such devices” would avoid the problem. Perhaps the Commission does. There may be isolated circumstances where FRS/GMRS might be more clear. But according to Uniden, when there is a large crowd, FRS/GMRS frequencies become congested. This might include beaches and anywhere within a few miles of a beach, seaside resorts, regattas, condominium complexes, Jazz Festivals in port cities. There would be tremendous incentive for people using the GMRS side to switch to less congested marine frequencies under these conditions. As Uniden pointed out by implication, the Coast Guard is not likely to raid a festival. Uniden's argument seems to be predicated on the assumption that GMRS/FRS frequencies would be more clear, I don't see this as a given. I will reiterate my belief that combo radios promote unlicensed use by reference only.

“Many of those users fail to purchase separate PRS radios for that purpose”

I concur with Uniden and because combo radios remain more expensive, the users will continue to fail to do so. In addition, unless combo radios make a remarkable market penetration, boat-to-boat will continue to be by marine radio.

“...would find it confusing and cumbersome to carry two-radios (sic) in order to serve the dual purpose of both service (sic).”

This may be true, but I do not believe the assertion. I cannot understand how picking-up the appropriate radio would be cumbersome or confusing.

“The expectation that everyone onboard will carry two radios (one for casual conversations, another for life-and-safety and other legitimate Part 80 uses) is not reasonable...”

This is correct because it is not reasonable to expect everyone onboard to carry a marine radio. On smaller, more casual boats, there is no need for everyone to have a marine radio or any radio at all. On larger ships with sophisticated crews, separate radio systems with perhaps onboard repeaters are provided. This, of course, is a generalization into which rare circumstances may not fit.

“Mr. Pomeroy accurately points to editing error that resulted in a description (of) CTCSS / DCS (selective calling) that caused it to appear as to be equivalent to voice inversion. Uniden apologizes to him and the Commission for this error. It was Uniden's intent to state that voice inversion allowed individuals within a group to communicate with a reduced likelihood that their communications would be overheard by others with no interest in their message.”

I appreciate that Uniden clarified that the purpose of voice inversion is to prevent interception of messages. Since CTCSS/DCS effectively prevents communication being overheard by those with no interest, the only remaining utility of voice inversion is preventing communications being overheard by people with an interest, such as those who wish to prioritize communication for effective channel sharing.