

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of:)	
)	
Review of the Commission's Part 95 Personal Radio Service Rules)	WT Docket No. 10-119
)	
1998 Biennial Regulatory Review – 47 C.F.R. Part 90 – Private Land Mobile Radio RM-9222 Services)	WT Docket No. 98-182
)	
Petition for Rulemaking of Garmin International Inc.)	RM-10762
)	
Petition for Rulemaking of Omnitronics, L.L.C.)	RM-10844
)	

COMMENTS OF RANGER ELECTRONIC COMMUNICATIONS INC.

Ranger Electronic Communications, Inc. (“Ranger”) respectfully submits the following comments in response to the Notice of Proposed Rulemaking issued by the Federal Communications Commission in the above caption Docket No. 10-119, Review of the Commission’s Part 95 Personal Radio Services Rules and the comments of others made thereto.

BACKGROUND

This response is made on behalf of Ranger by its attorneys. Ranger is one of the leading manufacturers of Citizen Band radios and other products. Ranger manufactures products for sale under its own brands and it also manufactures products on an OEM basis. Ranger designs its products using its own staff of engineers and actually owns the manufacturing facilities that produce its Citizen Band transceivers.

COMMENTS ON UPDATING THE RULES

Ranger agrees with the Commission's position, and that of others who have commented, that the rules set forth in Part 95 should be updated. Ranger believes that the rules are disorganized, in that some provisions related to Part 95 devices are found in other Parts, such as Part 2. Ranger believes that for simplicity, all rules relating to Part 95 devices should be either fully incorporated into Part 95 or cross-referenced in the Part 95 rules themselves to the other applicable Parts.

COMMENTS ON CODED TRANSMISSIONS

With regard to the issue of Coded Transmissions or Voice Scrambling on Part 95 services, Ranger agrees with the comments of others that scrambling of audible signals should not be allowed since it is contrary to the intent of the service and it is annoying to other users. However, non-audible coded or scrambled signals should be expressly allowed under the rules. Non-audible coded transmissions would not be an annoyance to other users of the service, but would allow for features such as user paging or other features consistent with the service.

COMMENTS ON POWER LEVELS FOR CB

With regard to Sky Wave Propagation and Power Levels for Citizen Band transceivers, Ranger does not believe that transmissions using Sky Wave are a problem. In Ranger's experience, most transmissions are brief lasting less than a minute or two. In fact, Ranger believes the service would be better served if the Commission increased the power levels to 10 watts and removed the mile limitation on transmissions. As others have commented, Sky Wave Propagation is possible, on some occasions, even with minimal power levels. Reducing power levels will not discourage certain users from engaging in long distance transmissions. Indeed, reducing power levels may encourage more users to purchase amplifiers or to purchase Amateur transmitters for use on the CB.

Further, as the Commission has noted, the use of Citizen Band radios has generally declined over the last 10 years. A four watt CB mobile radio, under most conditions, will not transmit more than about five miles. (a fraction of the maximum distance allowed under the rules) Even a four watt base station cannot transmit more than about 30 miles under perfect conditions. (under normal conditions, one would expect about 10 miles) With less other users to talk to, those who use their radio as a hobby are more likely to try to find ways to increase their power.

The use of amplifiers increases the probability of harmful interference because the amplifiers amplify not only the main frequency but also that frequency's harmonics.¹ Ranger would propose that the Commission modify the rules to allow for 10 watts of power, while requiring attenuation of any resulting harmonics to the same levels they would be at under current rules. By increasing the power of certified radios, less users would be tempted to add amplifiers to their transmitters. This

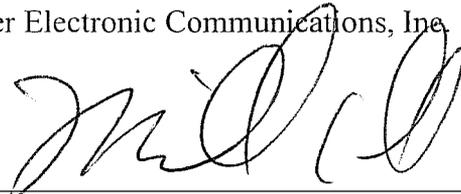
¹With the requirement that television signals be digital, and the consumers move to cable and satellite TV reception, the possibility for harmful interference from CB transmissions has become more unlikely

would also reduce the potential for harmful interference, while allowing users to continue enjoying the service despite the decline in the total number of users.

Respectfully Submitted,

Ranger Electronic Communications, Inc.

By:

A handwritten signature in black ink, appearing to read 'M. Olson', written over a horizontal line.

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Its Attorneys

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