

## Comments on RM-11625

April 2, 2011

I am an amateur radio operator (N6LDJ), GMRS licensee (KAF1291) as well as a registered Professional Engineer (P.E.) in California and Arizona. I have provided professional engineering services to state, local and federal government clients for over 21 years.

I support the ARRL's Petition in its entirety. While any particular Digital Mobile Radio (DMR) mobile or portable radio only uses one timeslot at a time, it occupies spectrum less than 50% of the time, allowing another radio to use the alternate slot. The repeater uses two timeslots, 100% of the time, which essentially provides the same spectral efficiency.

This spectrum-efficient technology is particularly beneficial in the populated area of Northern California as we have essentially lost use of the 440 MHz amateur band as it is shared with military radar systems. This has created significant pressure for replacement spectrum at 144 MHz and other amateur bands, including the General Mobile Radio Service (GMRS, Part 95) at 462/467 MHz. Such technology effectively quadruples spectrum efficiency over what is in use there today (e.g., wideband FM provide for one voice channel per 25 kHz versus one voice channel per 6.25 kHz with DMR)), providing some relief to spectrum shortages here.

This digital technology, as well as others offered by Kenwood, Icom, etc. have spurred new interest in amateur radio for me and others, and has provided hands-on training for those interested in career in the wireless communications field. Having analog radio experience is important, but having digital background is critical.

We urge the Commission to support this Petition.



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