

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION

In the Matter of
Amendment of Parts 1, 2, 15, 74, 78, 87, 90 and 97 ET Docket No. 12-338
Of the Commission's Rules Regarding Implementation
Of the Final Acts of the World Radiocommunication
Conference (Geneva, 2007) (WRC-07), Other
Allocation Issues, and Related Rule Updates

Comments of Jay Rusgrove concerning the amateur allocation at 135.7 – 137.8 kHz

When the question of a 135.7 - 137.8 kHz amateur allocation came up previously, the utility companies voiced concerns over *potential* interference to PLCs. Since there had been limited radio transmissions in this frequency range it was difficult to dispute these concerns. Since that time 10's of thousand of hours of transmissions from a number of experimental stations around the country have taken place. To the best of my knowledge there hasn't been even one complaint of interference. It appears that the utility companies were perhaps unaware that such transmissions were even taking place, as there is no mention of them in their comments. If there was interference or they were able to detect the experimental signals they surely would have mentioned that. Instead, the utility companies are back again with the same concerns over *potential* interference with no further information to justify their claim.

As license holder of WD2XNS, I have logged thousands of hours of transmissions in the 135.7 – 137.8 kHz frequency range at an ERP level of 1 Watt. These transmissions include beacon operations and two-way communications. WD2XNS signals are regularly received in Europe, South America and over most of the continental US and Canada. The transmitting equipment is home built and the transmitting antenna is a 90' top loaded vertical. The receivers are commercial and the receive antennas are a mix of directional and non-directional e probe, loop and beverage designs. I've described the equipment in use here so that all parties can visualize what a slightly better than average amateur setup would be like. Does anyone seriously think that such a modest setup threatens the power grid? Absent any data to the contrary, I would propose that it does not.

I recommend that the Commission proceed with the establishment of an Amateur Radio allocation at 135.7 – 137.8 kHz as has already occurred in a significant number of countries around the world.

Respectfully,

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