

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

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

To the Commission:

**REPLY COMMENTS OF JAMES E. WHEDBEE TO COMMENTS OF UTILITIES TELECOM
COUNCIL, AMERICAN RADIO RELAY LEAGUE, AND WARREN ZIEGLER, ET AL.**

COMES NOW, the undersigned JAMES EDWIN WHEDBEE, who pursuant to Sections 1.41, 1.415, and 1.419 of the Commission's Rules and Regulations (47 CFR Sec.s 1.41, 1.415, 1.419) respectfully replies to the Commission in response to the comments filed by Utilities Telecom Council (“UTC”), American Radio Relay League (“ARRL”), as well as Warren Ziegler (“Ziegler, et al.”) and similarly situated amateur radio commenters. The undersigned states, in reply, as follows.

1. The undersigned is an amateur radio licensee and has filed previous comments and related documents in the above-captioned proceeding and, therefore, is an interested party to these proceedings.

2. The undersigned concurs entirely with the Comments of ARRL, and wishes to be associated with those in their entirety as the Commission deliberates on the matter of a LF Allocation to Amateur Radio at 135.7-137.8 kHz. In this connection, the undersigned would only wish to emphasize that choosing to allocate 472-479 kHz to amateur radio is not mutually exclusive with an allocation at 135.7-137.8 kHz, and in fact, to harmonize the U.S. Allocation Tables with those of the world, it is necessary that the Commission grant both such allocations to the amateur radio service in accordance with its international treaties and agreements.

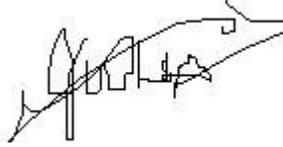
3. Ziegler, et al., correctly point out that a number of experimentally licensed radio operations on frequencies of 135.7-137.8 kHz and frequencies within the LF band in general have been granted and stations successfully operated thereunder without even the vaguest mention of interference from the electric utility community. To be pointedly clear, the reason there is no record of interference is because the electric utility community's fears of such interference is largely unfounded. Their equipment operates using connected lines rather than with radiated emissions (even though their equipment has radiated emissions), whereas radio amateurs employ radiated emissions; their equipment uses – if at all – modulation which is significantly different in bandwidth from communications modulation employed by radio amateurs; and, their ability to receive radiated emissions at modulational variance from their own equipment is considerably weaker than alleged in their comments. Unless a radio amateur is connecting the RF output to an electric power line – which is, frankly, not good engineering practice and therefore prohibited under amateur radio rules and regulations – there is, indeed, little or no chance whatsoever for an amateur radio station operating at 1 Watt EIRP to interfere with PLC equipment. Current experimental licensees have borne this out over and over again, whether or not electric utility companies are aware of it.

4. UTC correctly points out in its comments that the PLC protections the electric utilities are seeking are, in essence, a turf battle. The difficulty with UTC's comments are that they are disingenuous. Whether under experimental license or amateur radio license, ALL licensed operations have legal priority over Part 15 operations, including over PLC operations; accordingly, if the amateur radio community wanted to kick out PLC operations, they could have done so with as much efficacy under their experimental licenses as they could under their regular amateur radio licenses. We largely don't care about PLC operations because our modulation techniques get around potential interference problems from PLC.

WHEREFORE, the undersigned suggests the Commission overrule UTC and all other electric utility companies and proceed with allocating the proposed frequencies to the amateur radio service in accordance

with international treaty and agreement in WRC-07.

Respectfully Submitted:

A handwritten signature in black ink, appearing to read 'James Edwin Whedbee', written over a faint, light-colored background that looks like a map or a technical drawing.

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