

Received & Inspected

JUN 03 2013

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

In the Matter of)
)
Amendment of Part 97.301 (e) of the)
Commission's Amateur Service Rules)
and allow the Technician class license)
privileges to the 29.520 MHz to 29.700 Mhz)
portion of the 10 meter band)

RM-_____

To: The Commission

PETITION FOR RULE MAKING

The Toledo Mobile Radio Association (TMRA) believes that the current FCC rule for the amateur radio Technician class license in the 10 meter band is in need of revision. Currently Part 97: Sec 97.301 paragraph (e) states "For a station having a control operator who has been granted an operator license of Novice Class or Technician Class may operate from 28.000 MHz to 28.500 MHz.

With linking of various repeaters, the inception of Internet Radio Linking Project (IRLP) and Echolink, TMRA feels that Sec 97.301 (e) which allows the Technician class license privileges on the 10 meter band from 28.000 MHz to 28.500 MHz is outdated. TMRA's belief is the Technician class license should be expanded to also included 29.520 MHz to 29.700 MHz.

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Even though the Technician class license cannot transmit voice from 29.520 MHz to 29.700 MHz they are legal to use today's technology which consist of the linking of repeaters, IRLP and Echolink to access some of the same 10 meter repeaters.

IRLP and Echolink allow amateur radio use of Voice Over IP and the Internet. IRLP and Echolink use a network of servers and nodes allowing voice communications to repeaters worldwide. Using this technology along with the practice of linking VHF, UHF and 10 meter repeaters, a Technician class license can use his/her 2 meter/70 centimeter privileges and legally access a number of 10 meter repeaters.

The following are a few of many linked repeaters:

KQ2H-----29.620 MHz linked to VHF/UHF

W5DFW-----29.660 MHz linked to 442.975 MHz

W0PIE-----29.680 MHz linked to Echolink node 305758

WB2HWW--29.660 MHz linked to IRLP 7820 and linked to 440.700 MHz

W4APE-----29.600 MHz linked to 144.890 MHz

KB7KB-----29.620 MHz linked to 145.250 MHz

WB0QQK---29.640 linked to 444.875 MHz

Taking consideration of today's technology Sec 97.301 (e) is in need of updating.

With the proposed change to Part 97: Sec 97.301 (e) TMRA believes the voice privileges for the Technician class license would then coincide with today's technical advancement of the Amateur Radio Service.

Pursuant to Section 1.407 of the Commission's procedural rules (47 C.F.R. §1.407), that states "If the Commission determines that the petition discloses sufficient reasoning support of the action requested to justify the institution of a rulemaking proceeding, and notice and public procedure thereon are required or deemed desirable by The Commission, an appropriate notice of proposed rulemaking will be issued. In those cases where notice and public procedure thereon are not required, the Commission may issue a final order amending the rules. In all other cases the petition for rule making will be denied and the petitioner will be notified of the Commission's action with grounds therefor", the Toledo Mobile Radio Association respectfully request that the Commission issue a Notice of Proposed Rule Making at the earliest date amending the rules governing the Amateur Radio Service.

Respectfully submitted,

Toledo Mobile Radio Association

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May 25, 2013

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APPENDIX
PROPOSED RULES

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Proposed changes to Part 97: Sec 97.301 paragraph (e) are as follows:

PART 97 -- AMATEUR RADIO SERVICE

Current rule:

§Part 97: Sec 97.301 (e)

(e) For a station having a control operator who has been granted an operator license of Novice Class or Technician Class may operate from

28.000 MHz-28.5000 MHz

Proposed new and modified text of rule:

§Part 97: Sec 97.301 (e)

(e) For a station having a control operator who has been granted an operator license of Novice Class may operate from

Remain: 28.000 MHz-28.500 MHz

For a station having a control operator who has been granted an operator license of Technician Class may operate from

Remain: 28.000 MHz-28.5000 MHz

Addition: 29.5200 MHz-29.700 MHz