

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

Request for Waiver to License)
Banded Frequencies Currently) WT-13-212
Shared Between Part 90 and)
Part 95-A Services)

Request To Post the Original Petition and
To Extend the Time To File Comments

Filed by:

Personal Radio Steering Group
PO Box 851
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September 30, 2013

The PRSG is an advocacy organization for licensees and users of the GMRS.

The **FCC Public Notice** opens by stating:

By this Public Notice, comment is sought on the requests of Mobile Relay Associates (MRA) for waiver of Sections 2.106 and 90.35 of the Commission's Rules.

But the FCC neglected to make the text of the MRA request available for public inspection. We patiently waited for this text to show up as being available through the Commission's Electronic Comment Filing System (ECFS). It never appeared there.

How is the public expected to comment intelligently on an action which the FCC neglected to make available? All the public has through the ECFS is a brief summary of the waiver request, as incorporated into the Public Notice.

I have just today received a full copy of the waiver, but only because the FCC's identified *point of contact* personally emailed me a copy.

The Commission's handling of this waiver request has been highly irregular. A copy of the MRA's waiver request should have been made available through the ECFS, for instance as the lead item in the display of WT-13-212.

To remedy this situation, we ask that the Commission add this waiver request to the ECFS page, reissue the Public Notice acknowledging that the FCC has previously exempted the *entirety* of the GMRS from the narrowbanding requirements, and then (and *only* then) restart the clock for 30 days for the opportunity for the public to comment on the waiver request, and then another 15 days to reply to others' comments.

This is the only course of action that can comply with the requirement for a meaningful opportunity for public participation in this important matter that could affect thousands of GMRS licensees.

Sincerely,

Corwin D. Moore, Jr.
GMRS licensee KAB0220
PRSG Administrative Coordinator