

QUARTER CENTURY WIRELESS ASSOCIATION, INC.

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COMMENTS ON RM-9267

June 1, 1998

Secretary, Federal Communications Commission,
Washington DC 20554

Dear Sir,

The Quarter Century Wireless Association (QCWA) wishes to go on record as opposing the request of the Land Mobile Communications Council (LMCC), published as FCC RM-9267, to reallocate portions of the 420 to 450 MHz band from Government use to private sector use and, in turn, to the Private Mobile Radio Service.

The purpose of QCWA, founded in 1947, is to promote friendship and cooperation among Amateur Radio operators who were licensed as such at least a quarter of a century prior to their admission to the Association. More than 28,000 amateurs have joined the QCWA since its founding, and the collective experience of its members is hundreds of thousands of man-years.

The QCWA operates exclusively for charitable, educational and scientific purposes, and more specifically to promote interest in Amateur Radio Communications and the advancement of the electronic art, making use of the reservoir of knowledge and expertise within the membership for the benefit of all amateurs.

It is the opinion of the QCWA that allocation of these sub-bands to the Private Mobile Radio Service, either on an exclusive basis or shared with present Government users, would seriously reduce the utility of these sub-bands for use by the Amateur Radio Service.

The QCWA wishes to strongly support statements made by The American Radio Relay League (ARRL), in a release on May 12, that "At present in the United States, the Amateur Radio Service is secondary to military radiolocation (radar) in the 420-450 MHz band. Originally a primary allocation, secondary status came about during the 1950s when Cold War concerns made national security a high priority. Limited non-government, non-amateur use of the band is permitted -- but amateurs have priority over such use. LMCC misinterprets the significance of amateur secondary status and states that 'Amateur applications in the 420-430/440-450 MHz should remain secondary to PMRS'. The LMCC also suggests the possibility that 'recognizing that amateur radio service will see a net constriction by the recommended reallocation of 420-430/440-450 MHz,' 1390-1395/1427-1432 MHz might be allocated to the amateur service to offset this constriction. 'Constriction' is, of course, a bit of an understatement; LMCC has offered no ideas as to how amateurs could continue to share the bands."

The 420-450 MHz band is a mainstay of amateur service operations above 30 MHz, particularly in view of actions, in recent years, to reduce the size of amateur service allocations near 200 MHz. There is a great investment in equipment in the 420-450 MHz band, for individual users, for repeaters with which to make more efficient use of the available bandwidth, for weak signal research, for communications via Amateur Satellites, for public service communications and for emergency communications in times of disaster.

(Note: There are numerous documented cases of such communications by radio amateurs; see, for example, The FCC Rule Book (Tenth edition, 1995), Complete Guide to the FCC Regulations Governing Amateur Radio, Chapter 14, Serving the Public - The American Radio Relay League Inc., Newington, CT, ISBN 0-87259-510-2).

The consequences of reduced efficiency in use of 420-450 MHz by Radio Amateurs go beyond use of the band itself. One consequence would be more crowding and interference in the part of the band (430/440

MHz) still available for use by Radio Amateurs; or in another band used in lieu of 420-430/440-450 MHz. Another might be that those Radio Amateurs using linked voice or packet systems might find their operations constrained because some of the links involved operate in the 420-430/440-450 MHz band segments.

In conclusion, we note that the Amateur Service is recognized by the International Telecommunication Union as "a radiocommunication service for the purpose of self training, intercommunication and technical investigations carried out by amateurs, that is, by duly authorized persons interested in radio techniques solely with a personal aim and without pecuniary interest" (emphasis added).

Respectfully submitted

A handwritten signature in black ink that reads "John Kelleher". The signature is written in a cursive, flowing style.

John Kelleher, W4ZC,

President, Quarter Century Wireless Association