



## EMERGENCY MANAGEMENT DIVISION

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May 20, 1998

RM-9267  
Secretary  
Federal Communications Commission  
1919 M St. NW  
Washington, D.C., 20554

Respected Members and Staff of the Federal Communications Commission:

I am writing the Commission to voice my strong objections over the RM-9267 reallocation request made by the Land Mobile Communications Council. I am particularly concerned about the L.M.C.C.'s desire to seek primary authorization for the PMRS in the 440 to 450 MHz spectrum, where there are numerous amateur radio repeaters currently in operation and available for immediate use during disasters.

As a matter of background, Washtenaw County Emergency Management and our County Emergency Operations Center has always depended heavily upon amateur radio communications for a broad range of services including special public event health & safety communications provided by Amateur Radio Emergency Services volunteers, tracking of violent weather by Skywarn trained amateur radio spotters in conjunction with the National Weather Service, and twenty four hour a day on-call disaster communications volunteers who participate in the Radio Amateur Civil Emergency Service, a system created and operated under rules promulgated by the FCC.

Authorizing this reallocation would certainly have a devastating effect on the ability of dedicated amateur radio operators to provide these *voluntary* and *extremely important* services to the community. Since the 440 to 450 MHz spectrum is the second most popular FM band for amateurs, it follows that it is also one of the most important amateur radio bands for local emergency communications services.

What makes this band so important to us is really quite simple. First, this band is much less effected by over the horizon, longer distance and potentially interfering signals caused by temperature inversions and the like. On the surface this may not sound like much, but when faced with a large scale emergency and broad scale band interference at the same time, the impact is overwhelming.

My second reason for raising this objection is that the 440 to 450 MHz band is far enough up the spectrum to allow us the ability to communicate with local emergency communications volunteers on the popular two meter band while simultaneously communicating with other county Emergency Operations Centers, National Weather Service Forecast Offices, and others in the 440 MHz range. This dual capability is extremely important. With the popularity of amateur radio 440 MHz based repeaters, mobile radios and hand held radios, inter-county and inter-agency amateur radio communications are much more easily accomplished. Attempting to solely use two meters for close-in and inter-county emergency radio communications has consistently lead to severe receiver desensitization, which drastically decreases our ability to provide communications services to the public during time of crisis.

The 440 to 450 MHz spectrum has become a priceless resource to Emergency Management organizations and amateur radio operators across the nation. I respectfully submit to you that the Federal Communications Commission should not authorize the reallocation of the this spectrum because it is clearly not in the best interest of the public. To be frank, I have no objection to the other spectrum demands made by the LMCC. These bands, though I'm sure they are valuable to some amateur radio operators, do not impact on volunteer amateur radio emergency communications in this area and at this time.

Thank you very much for your attention to my comments. I plan on taking an active role against this reallocation bid, in particular with the Associated Public Safety Communications Officers who is a member of the L.M.C.C. and to my great surprise is apparently in support of this action.

Sincerely,



Marc C. Breckenridge, C.E.M.  
Director of Emergency Management

cc: Lloyd Fayling, President, A.P.C.O. Michigan  
Gordon Neihardt, A.P.C.O. Executive Council  
Allison Kasold, A.P.C.O. International Government Affairs Coordinator  
Randall C. Duncan, President, International Association of Emergency Managers  
J. Robert Johnson, President, Michigan Emergency Management Association  
Capt. Robert Tarrant, Michigan State Police Emergency Management Division  
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