

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Requests of Mobile Relay Associates for)	WT Docket No. 13-212
Waivers to Permit Part 90 Use of Channels)	
On the Band Edges Between Part 90 and)	
Part 95 Spectrum)	

COMMENTS BY P. RANDALL KNOWLES

1. Procedural Matter. I first note that, since the request made by Mobile Relay Associates (MRA) is not available by searching the Commission’s web site with reference to Docket WT 13-212, I am limited to addressing only that which I can ascertain from reading the Public Notice. Further, licensees and users in the General Mobile Radio Service are individuals and members of the public, in general unsophisticated in the workings of the FCC. Potential action such as sought here, with its major impact on the General Mobile Radio Service as discussed below, should only be considered in a full Rule Making Proceeding with wider dissemination to the general public and users of the GMRS. A back-door circumvention, such as sought here, while possibly serving the interests of MRA, is clearly NOT in the general public interest.

2. Substantial Interference Not in the Public Interest.

A. The FCC’s Public Notice makes reference to MRA’s contention that its proposed multiple exceptions to FCC Rules “will not overlap ... frequencies on either side” by virtue of “narrowbanding”. Such reasoning is fatally flawed – overlap would occur on not one, but ON BOTH SIDES of the guard band frequencies.

B. The Commission has already noted, in the Public Notice, that certain operations on the Industrial/Business side of the guard bands are NOT narrow band and overlap would occur.

C. The General Mobile Radio Service likewise is NOT narrowbanded either. Interference from MRA’s proposed operations will likewise overlap and interfere with existing licensed GMRS operations on 462.550 MHz, 467.550 MHz, 462.725 MHz and 467.725 MHz.

D. Such interference to established licensed operations will drive users on 462/467.550 and 462/467.725 MHz off of those frequencies. GMRS users have been through “frequency wars” before, where Business and Industrial operators attempted to, and all too often succeeded in, driving individual personal users off of their own GMRS channels. That result was rejected as not in the Public Interest by the Commission in its decision in Docket 87-265. There the FCC, in order to eliminate such grossly mismatched struggle between individuals and

commercial entities, limited all further eligibility for a GMRS license to only individuals.

E. GMRS was, from its inception as the Class A Citizens' Radio Service, designated by the FCC as intended to provide communications capabilities to entities NOT eligible in other private land mobile two-way radio services. When the Commission reallocated all but 8 channel pairs from GMRS to what is now Part 90, the need for business, industrial and other "commercial" eligibility ceased. In addition, in the 1950's the Commission also created the Business Radio Service, with its broad general business eligibility, further obviating the necessity for such operations in GMRS.

F. The Class A Citizens' Radio Service (now GMRS) was originally allocated the entire band from 460 – 470 MHz. All but 200 KHz were reallocated and given to what are now Part 90 operations.

G. If MRA is allowed to drive GMRS users off of 462/467.550 and 462/467.725 MHz, this constitutes fully 25% of the existing channel pairs for the entire Radio Service. This is clearly NOT in the Public Interest.

H. The back-door attempt by MRA is, from our perspective, but a thinly veiled attempt to begin the process of dismantling GMRS and grabbing the entirety of its spectrum for Part 90. Once again this is very clearly NOT in the Public Interest.

3. Technical details. Since the MRA request is not available for viewing, details of the proposed operation are obscure. For example, the amount of effective radiated power sought is unclear. It should be noted that the Commission has limited GMRS stations on 462 MHz interstitial frequencies to a maximum of 5.00 watts ERP, and antenna height to 20 feet above ground or building on which mounted.¹ FRS radios on the 467 MHz frequencies are limited to integral antennas on portable units only² and a maximum of 0.500 watts ERP³. The Commission has previously determined that these limitations are in the Public Interest. Is MRA proposing to limit its use to such parameters? If not, then its request is further not in the Public Interest in that regard as well.

4. Vastly Greater Public Interest for GMRS Use of Guard Band.

A. GMRS is a private land mobile radio service, just as are the Part 90 services. However it's the only such service providing for the personal communications of the American public. Only 8 channel pairs and 7 low power interstitial channels are available to serve these needs of our entire population. With such

¹ See Section 95.25(e) of the Commission's Rules and Regulations.

² See Section 95.647 of the Commission's Rules and Regulations.

³ See Section 95.639(d) of the Commission's Rules and Regulations.

drastically limited spectrum, any potential use of the adjacent guard band should be made available to the American public via Part 95, **NOT** businesses in Part 90.

B. One example of potential use which would be much more in the Public Interest is remote receiver linking for GMRS repeaters. Competition for UHF antenna sites is very great in virtually all major metropolitan areas as well as rural areas where tall buildings and structures are sparse. Without remote receiver capability, GMRS cooperative repeaters are often forced to strive for antenna sites as highly elevated as financially achievable in order to obtain the best performance for receiving low power portable (handheld) units.

C. Remote receiver linking via strictly controlled and limited guard band use is technically feasible. Operations licensed in the Experimental Radio Service testing this concept by GMRS users on interstitial GMRS frequencies have proven successful in the past. Such utilization would be in the Public Interest in at least two significant respects.

D. With remote receiver linking GMRS repeaters can be located on much lower sites. Firstly, this makes many more repeater locations available at much lower cost to GMRS users and user cooperatives.

E. Secondly, lower sites dramatically reduce the impact on the spectrum by GMRS repeater transmitters. This allows for substantially increased frequency reuse in the GMRS and correspondingly much greater number of people served.

F. I have given but one example of potential GMRS use of the Guard Band frequencies at issue, but the same general principles apply to other potential utilizations. Thus the proposal of MRA is dramatically less in the Public Interest than general American public use of the Guard Band frequencies for GMRS applications and/or enhancements.

5. Background. These comments are submitted by P. Randall Knowles. My experience in two-way radio dates back to 1960 when I first became involved in Citizens' Band (Class D CB) Radio (KPJ 1093). I have worked as a public safety dispatcher (both police and fire), a mobile telephone operator (Domestic Public Land Mobile Radio Service, predating cellular) and subscriber (KW 9598), and American Red Cross Disaster Representative (Special Emergency Radio at 47.42 MHz). I have held other FCC licenses in the Class B Citizens' Radio Service (KAN 0682), the Class A Citizens' Radio Service (now GMRS) (KAA 8142), the Experimental Radio Service (KK2XHV) and Marine Radio (WAD 7985 and WDB 4290). I have been an active GMRS user since 1970 and a GMRS repeater operator since 1971. I first became a mobile telephone subscriber in 1969 and have utilized cellular since 1986, when transportable equipment first became available in the Chicago area.

My background further includes service as a criminal prosecutor with the Lake County (Illinois) State's Attorney's Office and over 25 years experience as a municipal

prosecutor in Cook and Lake Counties, Illinois. I have served for many years and am currently a member of the Emergency Telephone System Board (which funds 911) in my community. I am a past Red Cross Disaster Communications Chairman (North Region, Mid-America Chapter) and founding member of North Shore Emergency Association (a public service and emergency personal radio organization) and Steering Committee Communications Lead for the Illinois Chapter, National Multiple Sclerosis Society. I served as Rule Readability Task Area Chairman of the FCC's Personal Use Radio Advisory Committee (PURAC) some 25 years ago.

My experience in GMRS of over 40 years includes directly assisting some 3 to 4 dozen groups in over 25 states to set up their own repeater systems and obtain proper licensing. I assisted several dozens of personal GMRS users to obtain licenses from the Chicago Regional Spectrum Management Center when that facility was in control of GMRS licensing in this area with its complex application (Form 425) and extensive technical information requirements. My wife and I routinely take GMRS radios with us when traveling, and I have first hand personal GMRS operating experience in over 35 states in the last several years.

Respectfully submitted,

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