In the Matter of

Low Power FM Radio Service ) MM Docket 99-25

COMMENTS OF

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I file these comments on February 24, 1999 in the FCC's Mass Media Bureau Docket 99-25.

Summary:

Here's the "keep it simple, stupid" low power FM solution on how the FCC can fully protect the integrity of the spectrum, provide new opportunities for non-commercial, community oriented radio broadcasting with additional diversity in radio voices and program services. This solution would not require any new frequency allocations or frequency re-allocations and it would not require any new FCC regulatory burdens. Best of all this solution should not result in any significant opposition from the NAB or Congress.

The "KISS" solution is for the Commission to authorize FCC amateur radio stations, if they so choose, to make non-commercial one way transmissions to the community, using existing UHF amateur frequency allocations, above 420 MHz.

Justification:

1. The amateur radio frequency frequencies above 420 MHz are seriously underutilized, on balance, in 99.9% of the United States. This fact can be confirmed by any of your FCC monitoring staff.
2. Amateur radio stations are licensed to an individual and licenses cannot be sold or transferred.
3. Amateur radio stations are non-commercial
4. Amateur radio licensees are individually tested under FCC jurisdiction.

5. Amateur radio licensees tend to be self-policing.
6. Amateur radio licensees live in their local community.
7. Amateur radio stations already voluntarily frequency coordinate using commonly accepted band plans. Because of this, frequency interference problems tend to be minimal.
8. Amateur radio licensees already have a diversity of radio voices.
9. Amateur radio signals above 420 MHz tend to be low power and local in nature.
10. Amateur radio antennas above 420 MHz tend to be very small in size.
11. Amateur radio antenna towers less than 70 feet high are generally permitted in any community. A signal from the typical amateur radio tower should cover most small communities.
12. All that would be needed to receive an amateur radio transmission above 420 MHz is an inexpensive scanner radio. These radios already are widely owned and can be purchased in any Radio Shack type store.

To make this solution work the FCC would only do three things:

1. Allow amateur radio FCC call sign ID's on the hour rather than every ten minutes.
2. Allow amateur radio one way transmissions to include community news, views and analog music content in the current amateur radio allocations above 420 MHz.
3. Allow one way transmission frequency coordination with generally accepted volunteer state amateur radio frequency coordinators.

Who would oppose this solution:

This solution will likely see opposition by the American Radio Relay League. The ARRL may claim that amateur UHF bands are too congested. This is not true. The ARRL may claim that amateur radio is for public service. This is true and this is exactly the reason for this solution. The ARRL may claim that amateur radio is to train morse code operators. This is no longer true. Not even the U.S. Coast Guard uses morse code for emergency communication. The ARRL may claim that amateur radio is a hobby. This is true and all the better to not be held accountable to multi-state large corporate commercial interests.

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What does this writer know about low power FM radio, amateur radio or radio in general?

I have held an amateur radio license for 40 years. My call sign is W0KIE. I was a U.S. Navy Communications Technician – Radio Branch with emphasis on morse code reception. I served at the Naval Communications Station on Guam Island and was trained at Skaggs Island, California.

I am past president of the Oral Roberts University amateur radio club and past president of the Tulsa Repeater Organization, Oklahoma's largest amateur radio club.

I am owner of the W0KIE Satellite Radio Network that airs programming on C band satellite , GE-1, transponder 12, 5.7 narrow band audio. The network programs can additionally be heard on the Internet using realaudio at http://www.w0kie.com The network programming is aimed at the back yard dish owner and amateur radio operator. The majority of the W0KIE Network listeners are amateur radio licensees and nearly all of them wish to obtain a low power FM license. Most of them do not have the thousands of dollars needed to pay for an expensive engineering study and then stand to lose it all in a FCC license lottery. My "KISS" solution would solve this problem.

I am also an enrolled Creek Nation citizen.

In closing, my solution is fully and completely in the public interest and will meet each and every FCC objective of MM Docket 99-25.

Submitted by:

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