

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)
)
Amendment of the Amateur Service) WT Docket No. 97-12
Rules to Provide for Greater Use)
of Spread Spectrum Communication)
Technologies)

To: The Commission

Opposition to the petition for reconsidering Report and Order FCC 99-234.

I am Amateur Radio Operator KC5GOI, Guy Story. I have been a licensed Radio Operator since May 1994. I am an active member of Tucson Amateur Packet Radio Corporation (TAPR) for 5 years. I am submitting comments on the subject of Clearwire Technologies (CT) request for Partial Reconsideration of FCC 99-234.

Discussion:

Clearwire Technologies (CT) first request is in conflict with their statement, "Clearwire supports giving Amateur Radio licensees more flexibility in spread spectrum modulations; permitting amateur licensees to use power up to 100 watts". CT requests that Amateur Radio spread spectrum (SS) transceivers over 1 watt be tested for compliance in regard to output power control. CT does not address any other form of interference beyond SS. Other amateur radio operations on the 2.4 GHz band can operate at output power levels beyond 100 watts. The potential exists for interference from other Part 15 devices as well as Part 97.

CT's requests for station identification requirements can cause a significant increase in the costs of developing SS equipment for the amateur allocations in several allocations including 2.4 GHz. CT has not provided any proof that this interference exists. CT only presumes that the potential exists, yet have not offered any proof. There is no proof from CT that additional enforcement are required.

CT's request to limit the amount of transceivers is also unreasonable. The limitation of 1 transceiver assembled per year only poses to stifle the growth of SS in the amateur radio service. There are many amateur radio operators that do not possess the skills of radio technology to assemble potential kits. In multiple instances the assemble and service of equipment is performed by a technically skilled operator while the implementation and usage of the devices is by Amateur Radio operators that are proficient at usage of that equipment. This type of trade off happens on a regular occurrence. CT's request could cause a reduction in these efforts. The end result is a request that is in conflict with Part 97.1 subparagraphs a through d.

Conclusion

CT has not provided evidence that operations by the Amateur Radio service cause interference with Part 15 devices that are not protected from interference from Part 97 equipment, SS or otherwise. CT's requests are in conflict with multiple sections of Part 97 that they have not requested to be modified. The requests that CT have brought to the FCC only serve to hamper operations by the Amateur Radio Service while giving Part 15 immunities from interference that is clearly not given to Part 15. While the potential revenues for Part 15 devices are substantial, the ability for Amateur Radio to provide in cases of emergency is unmeasurable. Operations of SS may be used in various situations and CT only seeks to increase its revenue without the concern of communications in the event of a disaster. It is in this Amateur Radio operator's opinion that the request made by CT be denied.

Respectfully submitted,

By: /s/ Guy Story, KC5GOI

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