

From: <BFITPC@aol.com>
To: <RGURSS@shb.com>, <DYOUNG@fcc.gov>
Date: Monday, August 07, 2000 7:58:30 AM
Subject: Re: STA Request for Los Angeles County, File # 0330-EX-ST-2000

I am constrained to note again that Mr. Kelsey and the Southern California Repeater and Remote Base Association has no authority to coordinate inter-service uses of amateur frequencies. The definition of a frequency coordinator in the Amateur Service is set forth at Section 97.3 of the Commission's rules and makes clear that the role of such coordinators is to coordinate amateur uses.

As well, amateur frequency coordinators coordinate only fixed repeater and auxiliary uses. Other amateur uses are neither known to SCRRBA nor does SCRRBA have any authority to represent them. In this case, there is no evidence that either Mr. Kelsey or SCRRBA even polled the repeater users on this subject. Those users confer whatever informal authority and recognition SCRRBA has.

Any reliance, therefore, on the oral representations of Mr. Kelsey as a means of asserting coordination with the amateur radio community in an entire band is misplaced.

As an example of the problems that would be caused by the proposed operation which would not be remedied by contacting SCRRBA, there is in the 2400-2450 MHz amateur band a Japanese EME segment, on which United States amateurs listen for Japanese amateurs conducting moonbounce experiments. This would be impossible in Los Angeles if the proposed operation of the County is authorized. SCRRBA has no knowledge of these types of non-repeater uses, which are outside the scope of its authority.

The American Radio Relay League restates its strong objection to the STA proposed by Los Angeles County, and to any experimental authorization in the 2400-2450 MHz band.

Chris Imlay
General Counsel, ARRL

CC: <bcross@fcc.gov>, <wcross@fcc.gov>, <W5JBP@aol.com>,
<W6XD@arrl.org>