

Form 405 Confirmation Number: EL342244
Form 405 File Number: 0301-EX-CR-2021
Date of Submission: May 9, 2021

Justification for Renewal

Since the original grant many changes have occurred in the service and wireless industry that will directly affect the outcome of our experiment. These are positive developments which could change our experimental conclusions. The following significant changes have occurred since our original grant in 2019:

- New repeater models have become available with improved features useful to GMRS, and that appear to provide different or improved co-channel protection methods;
- New mobile radio models are available that appear to improve co-channel protection to existing, legacy analog radios systems, such as automatic dual-mode (analog/digital) reception; further models are expected to be released over the next few years;
- The GMRS has experienced significant year-on-year growth in the number of licensed users and repeaters; this is partially due to the use of GMRS for Community Emergency Response Teams (CERT) related to California fire season problems, as well as the flood of low-cost, Chinese-manufactured radio products through convenient on-line retailers; this will occur over several years; and
- The GMRS license fee will be reduced this year to \$35 from \$70 for a ten-year term. This will likely increase the number of GMRS users over time.

All of these factors will affect how we evaluate and analyze digital voice and messaging communications in the GMRS with regard to digital on shared-use channels.

We are requesting an additional three years of operation to fully evaluate these changes as well as other unanticipated changes anticipated to occur over this critical period.

END OF DOCUMENT