

**Before the
Federal Communications Commission
Washington, DC**

In the matter of)
)
Amendment of Part 97 of the Commission's) RM-10413
Amateur Service Rules Governing)
Operating Privileges)

COMMENTS OF K7REC

1. Although not an ARRL member, I will support the American Radio Relay League's ("ARRL") proposals to "refarm" the Novice/Technician spectrum and expand the phone bands. The expansion of the phone bands will permit more efficient use of the spectrum using the most popular mode (phone).
2. I do have concerns about the expansion of capabilities in the 222-225 MHz band. In the Southern California area coordinated by the 220 Spectrum Management Association ("220SMA"), virtually every ounce of 222-225 spectrum is coordinated to a repeater or being used following the established band-plans for the region. With the elimination of the 220-222 MHz band several years ago, spectrum users in Southern California with control links, repeaters and long distance packet connections were either squeezed into the remaining 222-225 band, as well as the 219-220 and 70cm bands. The Southern California 222MHz spectrum can not make any more sacrifices in order to add spread spectrum to the bandplan. If such operations are ever approved, we remind potential users that coordinated users have spectrum priority over uncoordinated users.
3. We will support ARRL's proposal for "2x1" special event callsigns in the areas where no mail delivery service is available as long as it does not set a precedence for the use of "2x1" special event callsigns in other areas including Alaska and Hawaii.

Respectfully Submitted

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