

Federal Communications Commission  
Washington, D.C. 20554  
October 20, 1999

In Reply Refer To:  
2000F/WTC

The Honorable David Dreier  
U.S. House of Representatives  
112 North Second Avenue  
Covina, California 91723

Attn: Chris Freeland

Dear Congressman Dreier:

Thank you for your letters dated August 10, 1999, and September 1, 1999, on behalf of your constituents, Messrs. Dale Buxton and Larry Labb. These letters follow up my letter of June 29, 1999, to you. Messrs. Buxton and Labb again reiterate their objection to certain decisions recently made by the Southern California Repeater and Remote Base Association (SCRRBA), an amateur service frequency coordinator in southern California. In their August 6, 1999, letter to you Messrs. Buxton and Labb, specifically object to the SCRRBA's technical standards for coordinating an amateur station operating as a repeater station, its decision to coordinate a station on a channel five kilohertz away from another repeater station, and they object to other actions taken by the SCRRBA. In their August 31, 1999, letter to you Messrs. Buxton and Labb include a series of detailed questions about repeater coordination in the amateur service, ask whether certain actions of the SCRRBA are permitted, and ask for confirmation of answers previously received to these questions. Your letter has been referred to this office because the Amateur Radio Service is administered by the Public Safety and Private Wireless Division of the FCC's Wireless Telecommunications Bureau.

By way of background, we note that the Commission's Rules and policies applicable to frequency coordination in the amateur service were established in a 1986 rulemaking proceeding. See Amendment of Part 97 of the Commission's Rules Concerning Frequency Coordination of Repeaters in the Amateur Radio Service, PR Docket No. 85-22, Report and Order (copy enclosed), summary at 51 Fed. Reg. 17324 (1986) and Memorandum Opinion and Order, 2 FCC Rcd 243 (1987). In this Report and Order, the Commission decided to continue relying on voluntary coordination of amateur service repeater stations because mandatory coordination of repeaters was too drastic a remedy without first determining whether the rules adopted in this Report and Order would address repeater-to-repeater interference. See Report and Order, at 15. The Commission also stated that because amateur service frequency coordinators derive their authority from the voluntary participation of the entire amateur service community, their recognition must be derived from the same source. Thus, the Commission stated that it was essential that frequency coordinators respond to the broadest base of local amateurs and consider the concerns not only of repeater owners but also of those users of spectrum affected by repeater operation. See Report and Order, at 25. Accordingly, the Commission did not establish a mechanism to officially recognize local or regional

coordinators.

The amateur service rules provide, therefore, that a local or regional frequency coordinator is responsible to amateur radio operators whose stations are eligible to be auxiliary or repeater stations. See 47 C.F.R. § 97.3(a). These operators include all individuals who hold a Technician, Technician Plus, General, Advanced or Amateur Extra Class operator license. See 47 C.F.R. § 97.205(a). This group of licensees is the "broadest base of local amateur operators" possible because it includes all licensees whose stations are eligible to be auxiliary or repeater stations. As stated in my letter dated June 29, 1999, because frequency coordination in the amateur service is voluntary, in this context we do not regulate frequency coordinators or officially recognize any entity that chooses to serve as a frequency coordinator. See Report and Order, at 24-25. For this same reason, there also is no specific Commission rule requiring the licensee or control operator of an amateur service repeater station to obtain the approval of a frequency coordinator before it may start transmitting messages. See Memorandum Opinion and Order, 2 FCC Rcd 244; 47 C.F.R. § 97.205(a). Consequently, the frequency coordinator is responsible to the local or regional amateur service community rather than the FCC.

While the FCC does not regulate these coordinators, per se, because the needs of repeater users vary widely between communities, it recognizes the value of coordination. See 47 C.F.R. § 97.205(c). An entity that considers the concerns only of repeater owners, however, would not be considering the concerns of other users of spectrum affected by repeater operation and, therefore, would appear at odds with the definition of a frequency coordinator in the amateur service. We envision that an entity not considering the concerns of other users of spectrum affected by repeater operation can be replaced by a broad base of local amateurs choosing another frequency coordination entity and recognizing that entity's decisions. In this regard, we note that Messrs. Buxton and Labb state in their letter dated August 31, 1999, that they are forming a new coordinating entity in southern California, Southern California Frequency Management, which they also state will represent the entire amateur service community. Changing coordinators is the mechanism that the Commission anticipated amateur radio operators in a local or regional area would use to replace a frequency coordinator that was not representative of all local amateur radio operators or otherwise meeting their needs. As stated in my previous response, the function of an amateur service frequency coordinator is limited to recommending transmit/receive channels and associated operating and technical parameters for auxiliary and repeater stations in order to avoid or minimize potential interference. See 47 C.F.R. § 97.3(a).

We also note that the FCC's longstanding policy of permitting amateur radio operators to collectively self-regulate coordinators of amateur service repeater stations has generally been a resounding success. We believe that this policy has allowed the local amateur radio community to determine for itself whether frequency coordination is needed on a particular amateur service band and, if so, what function(s) the local amateur radio community is willing to allow the frequency coordinator to perform. In this regard, we note that recently the Commission received notification that some amateur service licensees have recognized a new coordination entity in both Indiana and the New York City Tri-state area. These actions were taken without the involvement of the FCC and this

approach keeps coordination at the local level, where people who more readily have knowledge of the facts can respond to the situations expeditiously and where the coordinator is directly answerable to the local amateur community. As stated in my earlier letter, there are no Commission rules governing the selection of a coordinator or the procedures for coordination. Because the needs and conditions in the Amateur Radio Service vary widely between locations, amateur radio operators have the flexibility to make these decisions at the local and regional level.

While the Commission receives relatively few complaints about the decisions of frequency coordinators in the amateur service, based on the experience of Division staff, it receives more complaints about coordination matters in Southern California than any other area of the country. In part, this disparity appears to be due to the unique geographical characteristics of the area, the large concentration of population in a relatively small land area, and the fact that amateur radio operators have chosen to place their repeater stations at very high elevations thereby covering large land areas with a single station's signal. The effect of these decisions has been to limit the number of stations that may transmit on the available amateur service channels without interfering with each other. These unique characteristics may best be considered in coordination decisions made at the local level, where the coordinator answers directly to the local amateur community.

With regard to Messrs. Buxton and Labb's question concerning an e-mail response from another Commission employee, I note that the Commission has never selected or approved any entity as a local or regional amateur service frequency coordinator, or reviewed the coordination decisions of a particular amateur service frequency coordinator. In cases of interference between two or more repeater stations, the frequency coordinator the Commission recognizes is the entity recognized in a local or regional area by amateur operators whose stations are eligible to be auxiliary or repeater stations. In the few geographical areas where the local or regional amateur service community has decided that recognition of multiple frequency coordinators for one of the amateur service frequency bands best meets its needs, we expect that the coordinators will cooperate with each other so that station licensees may make the most effective use of amateur service frequencies, as required by the amateur service rules. See 47 C.F.R. § 97.101(b). In the event that the transmissions of a repeater station cause harmful interference, as defined in Section 97.3(a) of the Commission's Rules, to another repeater station, and both repeater stations have been coordinated, the two station licensees are equally and fully responsible for resolving the interference. See 47 C.F.R. § 97.205(c). The fact that multiple coordinators may be involved does not absolve the station licensees of this responsibility.

I trust that this letter is responsive to your inquiry.

Sincerely,

D'wana R. Terry  
Chief,  
Public Safety and Private Wireless Division  
Wireless Telecommunications Bureau