

COMMENTS FROM BILL CROSS OF THE FCC REGARDING COORDINATION.

This is part of the presentation made by Mr. William Cross (W3TN) of the FCC's Public Safety and Private Wireless Division of the Wireless Telecommunications Bureau at the "FCC Forum" during the 49th Dayton Hamvention.

#####

Repeater coordination

Now for the last topic I want to talk about: repeater coordination. Last summer, we received a number of letters from a congressman on behalf of two constituents who were unhappy about some decisions the local frequency coordinator had made.

They specifically objected to SCRRBA's new technical standards for coordinating and a coordination decision it made. SCRRBA is one of the frequency coordinators in Southern California. In essence, their question was how to oust an incumbent coordinator.

We responded to the congressman with a letter that has come to be known as the Terry letter, after D'wana Terry, the Chief of the division I work in and the signer of the letter. I wrote the letter. It was published in Worldradio, different websites, and in other places. In publishing it, some people took the liberty to do some editing. Others omitted part of the letter. Others gave their spin on what it really said. Spin masters apparently are not limited to Washington, D.C.

Most of you have probably never heard of this letter. Others characterized it as a new Magna Carta. The most notable feature of the letter was that it said absolutely nothing new. It merely restated the FCC's long-standing repeater coordinator policy.

Repeater stations are one of the multitude of type of stations your license authorizes. Our rules provide that any station licensed to the holder of a Technician or higher class operator license may be a repeater. The decision as to whether to put up a repeater is the station licensee's decision.

Frequency coordination of repeaters, and later auxiliary stations, is a process that you developed in order to avoid or minimize potential

interference. You saw the need for this function back in the 60s and 70s as more and more licensees wanted to put repeaters on the air. You worked this out so that multiple repeaters could co-exist.

Frequency coordination in the amateur service is voluntary. Always has been. In 1987, in PR Docket No. 85-22, Report and Order Memorandum and Opinion and Order, the Commission on decided to continue relying on voluntary coordination of amateur service repeater stations. There is no Commission rule requiring approval of a frequency coordinator before a repeater goes on the air. This is what the letter said.

Frequency coordinators are entities that are recognized in a local or regional area by amateur radio operators whose stations are eligible to be auxiliary or repeater stations. Frequency coordinators may be individuals, clubs, or informal groups. They don't have to be hams, but they usually are.

Frequency coordinators derive their recognition from the voluntary participation of the local or regional amateur service community. We do not tell you who your frequency coordinator is. The frequency coordinator is responsible to you - it is not responsible to the FCC.

In a system where you voluntarily choose to put up a repeater and voluntarily recognize the coordinator, a coordinator not considering the concerns of all users of spectrum affected by repeater operation can be replaced by a local amateurs choosing another frequency coordination entity. Changing coordinators is the mechanism that we anticipated you would use to replace a frequency coordinator that was not representative of all or otherwise meeting your needs.

This process does not involve the FCC. The FCC does not recognize or regulate local or regional frequency coordinators, per se. The list of coordinators in the ARRL Repeater Directory is there for whatever editorial or informational purpose the ARRL decided this list would serve. Complaining to us about them isn't going to do you much good -- we aren't going to send Riley after an entity we don't recognize in the first place.

The function of an amateur service frequency coordinator is to recommending transmit/receive channels and associated operating and technical parameters in order to avoid or minimize potential interference. The action word is recommend. You may go to your local frequency coordinator and ask about getting coordinated. The coordinator can tell you that its database shows no available channels. Or that it cannot recommend transmit/receive channels or associated operating and technical parameters for your station. There are a multitude of reasons

they may not be able to.

As long as you do not cause harmful interference to another station, however, you can put your repeater on the air. Section 97.205 provides the authority. The licensee of the repeater station is responsible for that station. It may be that the standards the coordinator is using do not fit your area or that there are facts about local conditions that are not known to the coordinator, or that the database is out of date.

A frequency coordinator does not have the authority tell any licensee that he or she may not put a repeater on the air. Telling you that would in essence, restrict what your license authorizes. Only the Commission can do that. The coordinator's decision is to coordinate your station or to not coordinate your station.

The FCC's longstanding policy of permitting amateur radio operators to collectively self-regulate your repeater coordinators has generally been a resounding success. This policy has allowed you determine for yourself how to meet your needs.

There are no Commission rules governing the selection of a coordinator or the procedures for coordination. The technical standards a coordinator uses such as distance separation, propagation models, channels spacing etc are not FCC standards are not in the rules. If the standards a coordinator is using are "wrong" in some sense, tell the coordinator.

I assure you that different coordinators around the country use different standards. Amateur radio operators and coordinators have the flexibility to make and change these standards at the local and regional level. If the coordinator doesn't listen, find someone to better perform this function. Coordination is an option to serve your needs.

Voluntary coordination and the flexibility that goes with it has allowed you to respond to local situations in a manner that meets your needs. For example, a coordinator in the New York City area folded up his tent some years ago. Amateur service repeaters continued to operate. Later, licensees in the Tri-State area decided they wanted to try coordination again, but they carved up the area differently: a new coordinator did some of the area and a coordinator in Connecticut does some of the Long Island counties, as I recall. Some areas have no coordination entity. The local hams can do this because the rules do not hamper them. The process need not involve us, does not involve us, and it should not involve us. I have the greatest confidence that you can do a better job collectively solving your local or regional problem than the FCC ever could.

Frequency coordination is taken without the involvement of the FCC. 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.

If you want, you can have multiple coordinators in a state or on a band, part of a state coordinated (like the urban parts) and other parts not, some bands coordinated (the congested ones I suppose) and some bands not coordinated. If one of these models fits your needs, then use it. There are a lot of other models, too.

The Commission receives relatively few complaints about the decisions of frequency coordinators in the amateur service. Southern California is the exception. In part, this disparity appears to be due to the fact that licensees have chosen to place their repeater stations at very high elevations. High antennas cover large land areas with a single station's signal.

This law of physics applies to the rest of the country too. If you place an antenna at a very high elevation, say Mount Washington or McKinley, the Sears Tower, or way up on a broadcast tower, the signal will cover a large land area. Considering that sometimes you can see the Atlantic Ocean from the top of Mt. Washington or watch NYC TV stations on line of sight, you better believe a repeater is going to cover most of New England. The effect of putting these things way up high is to limit the number of repeaters that may transmit on a repeater channels without interfering with each other.

High antennas and big coverage areas have a tradeoff - fewer repeaters can co-exist on the channel. Now you - not the FCC - have to decide who gets to be the repeater. Is it this club or that club? This person or that person? Who gets to keep the channel at the end of a civil war in the club? How do you decide? Don't come to me - I don't have a clue what the local conditions or politics are. And I have no basis for saying "yes" to one and "no" to another. This isn't a Federal issue. Rather, it's as local as you can get.

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 the few geographical areas where the local or regional amateur service community has decided to have multiple frequency coordinators, we expect that the coordinators will cooperate with each other.

If they don't, you the users will not be able to use your channels. The requirement that licensees may make the most effective use of amateur service frequencies, is still there and the fact that multiple coordinators may be involved does not absolve licensees of this responsibility.

#####

Note: The previous text was provided by the W5YI Report and as stipulated in the original copy: "May be reproduced providing credit is given the **The W5YI Report.**" We wish to thank The W5YI Report for providing this information.

Please note that only a portion of Volume 22, Issue #11, June 1, 2000, of **The W5YI Report** is reproduced here. However, the complete text of the subject of interest is provided.

This document is copyright 2008, National Frequency Coordinators Council, Inc. Washington, D.C. All rights reserved.