

Letter from Licensed Ham Radio Operators in Southern California **Re: RIN 0596-AD44**

INTRODUCTORY STATEMENT:

Licensed amateur radio operators stand together in opposition to the proposed fees by the National Forest Service (NFS) to be levied upon the owners of essential amateur radio sites found on NFS land.

We ask that no fees be assessed to our civic service community. The fees would damage our ability to continue valuable emergency communications services and skills that we voluntarily supply our communities, nationwide, as charted in FCC Part 97.

HISTORY and BACKGROUND:

Amateur radio operators have been voluntarily supporting emergency communications (EmComm) a long time, even before we first began to be licensed in 1912 when Congress approved the Radio Act of 1912.¹

Among the largest and oldest EmComm groups in the United States is the Amateur Radio Emergency Services (ARES). ARES is the field organization of the American Radio Relay League (ARRL) since 1935.²

Amateur radio operators belonging to ARES have voluntarily responded to local and regional disasters since the 1930s. Notable in recent history include the attacks of September 11, 2001, and the category-5 storms Hurricane Katrina and Hurricane Michael.³ During the more recent Colorado fires amateur radio operators, despite the loss of their own homes, responded to help with EmComm during evacuations.⁴ Numerous examples are cited regarding the public communication safety net Amateur operators make possible.^{5,6,7,8}

FOR CONSIDERATION: Reasons why our ability to continue to afford to operate is so important, include:

- **Forest Service Operations Benefit by Repeater Towers and Other Equipment in Vaults on Forest Service Lands.** For example, we currently turn and point our cameras to follow smoke/fire status in times of need, at no charge, which helps the NFS and other agencies to protect our forests.
- **Valuable Existing Emergency Communication Infrastructure Could Be Lost.** Repeater towers and vaults that house essential associated equipment vital to amateur radio operations, are owned by individuals with limited financial resources. Some are non-profit 501(c)(3) organizations which rely 100% on voluntary member dues. The proposed fees would decimate most annual budgets.
- **Repeater Owners/Operators/Trustees Already Spend Large Amounts of Their Own Money** on upgrades, repair and maintenance of vital equipment weather beaten by winds, ice, snow, and other harsh conditions. Additionally, they personally fund back-up power with solar panels, generators, fuel, and delivery of fuel-sometimes over unpassable roads.

- **Entire Communities' Benefit Because of Repeater Towers and Vaults** and other equipment; amateur radio operators depend on that equipment to cover emergency communications when there is no other way to pass vital information. Those **communities would be impacted negatively** if a local repeater owner is forced to shut down due to the fees, and then an event causes cell tower networks to fail.
- **Internet Access is Not Always Available**; many repeater site owner/operators rely on building internet access through 'microwave bridges' at additional personal cost, without burdening communities with additional fees.
- **Amateur Radio Operators Also Support Community Public Events, with Gatherings of All Sizes**. The attached newspaper article describes some of the ways amateur radio is an asset to urban and suburban communities served by the repeater radio towers that need to be located up high.⁵
- **Amateur Operators Are Called Upon by Government and Non-governmental Agencies**, to support essential communications made possible only by relay equipment located on key NFS locations.
- **Amateur Operators Respond Without Compensation**; In fact, legally we are not permitted to charge for what we do. Our civic service is given voluntarily wherever and whenever needed.
- **Communities Within Reach of Repeater Towers Benefit Financially**. As just one example, the 'Orange Section' ARES volunteer organization, serving Inyo, Orange, Riverside, and San Bernardino Counties, covers over 38,000 square miles with a population over seven million people. In 2021, our ARES Program supported thirty public service events. This represents 587 volunteer hours, at a cost savings to the public of \$16,182. ("ORANGE SECTION | ARES") Additionally, they responded to fifteen emergency operations representing eighty-two service hours at cost savings of \$2,262. These figures may even be higher because volunteers do not always report all their hours.⁸

SUMMARY POINT:

Repeater equipment built, supported, and shared by highly skilled amateur radio repeater owners and radio operators, is essential. The systems we put into place are the ultimate "PLAN B" for America's emergency communications.

Fees may cause repeater networks to become unaffordable, and some repeater operators may need to cease operations. Amateur radio operators would be undeniably handicapped without their local repeaters. The emergency communication assistance that we have traditionally provided our communities, would be inadequate without all the essential tools needed to carry it out, including affordable repeaters.

The goals of Executive Order 13821 would be self-defeated, by pricing strategically placed repeaters out of service. We trust the FCC will continue to support emergency communications, by excluding the proposed fees from being assessed on repeater/vault owners that house essential equipment on NFS and other lands.

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Attachment_1 1-13-2022 Newspaper Article, *Ginger Gabriel* - Special to *The Alpine Mountaineer*, San Bernardino County, CA.

Ham radio operators never lose communication

By **GINGER GABRIEL**
Special to *The Alpine Mountaineer*

Where were you when your power, cell phone and WiFi went out?

George said he went out to his garage to get his generator and realized that his garage door opener wouldn't work. No power! He finally figured it out but realized that it wasn't a good idea to store his new generator in the garage.

Many of us mountain people were made aware that we weren't prepared for power and communication failure.

Even those who still had heat and water panicked when there was no cell phone, no TV, no Internet, NO ALEXA! Some teenagers went into withdrawal as they stared at their dead cell phones, willing for cell life to be restored.

Many of our elderly were horrified when they realized their alert devices around their neck or wrist were also dead. "What if I had a fall, a heart attack or some other life-threatening event and I couldn't summon help?" Marlis cried.

So I called an "alert-style panic button device" company that heavily advertises to the elderly. After listening to his sales spiel, I asked, "What if the cell towers are down and we lose WiFi? Will your system still work?" His answer: "I have no idea. We don't design systems for when communication is out. This is not a telecommunication company!" I said, "Thanks" and hung up.

I asked myself, "Is it safe to live on the mountain? What's the possibility of this happening again? What if someone in my house has a heart attack or I'm alone and I fall? How can I get help? How often will the power grid and fiber optics fail?"



Jo Stringfield always has communication options with her handheld ham radio as a member of MTARA.

There is a group of people on the mountain who never lost touch with the outside world. They are your neighbors – 400 of them across the mountain. They are internationally known as Mountain Top Amateur Radio Association (MTARA).

What intrigued me the most about this communication system and this group in particular is that I could have a small handheld radio with me all the time. I could take it with me on a walk or in my car and, with that radio, I could be in communication with a live person who could get me help if I needed it. There would be a person who would know that I needed help and could alert an ambulance or police officer when I needed assistance (and no monthly fees). This group on the mountain prepares for these tough conditions year round. They were already prepared when Verizon and Spectrum's fiber optics went out.

I asked Tracy Lenocker, MTARA's communication guy and the FCC (Federal Communications Commission) trustee for the club how I would get started. He replied that first I needed to get licensed. The club offers that class twice a year. It's illegal to transmit on amateur radio frequencies without an FCC license.

When I looked up "ham radio" on the Internet, I found that if you want to be a radio operator you have to always follow FCC regulations when operating on an amateur radio. But, again, you first have to get a license!

There are three different licenses. The first is the technician which will permit a person to use VHF and UHF channels which can be done with a handheld radio. The second is the general license which enables you to use HF bands which are nationwide and worldwide. The third is the amateur extra license which includes a lot of additional expertise.

The local MTARA offers these tests or you can take

the tests online. You have to pass the test with at least a 74 percent and need a U.S. mailing address and a tax ID or Social Security number to fill out the registration form. Upon passing the test, you will get your own call sign and your name will appear on an FCC database.

"The advantage of joining the local MTARA club," Lenocker said, "is that they will help pick out the best handheld radio for your purposes and will always be there for support. Most all of the club members have (radio) capability with a handheld radio and a 50-watt base station or mobile radio station. Many of them are also ARES, CERT, ECS and FEMA trained, which means that they are all exceptional people, exceptionally trained for emergency situations. All the members, with their equipment, can get messages out for a distance of 80 miles in any direction. The club maintains amateur radios in the three fire stations, the sheriff's offices and at Mountains Community Hospital. The club also has purchased 120 radios for the school district."

Lenocker expressed much pride in the fact that MTARA provides for their own club members, "We track members coming up the mountain or driving down in fog, rain and snow conditions to make sure they arrive safely. We report on weather, road and traffic conditions nearly daily in the winter to our traveling members."

MTARA does not rely on grid power or fiberoptic cell towers or WiFi to keep their members safe. MTARA appears to be a safe alternative for communication security for our mountain populations.

A note to us locals: In addition to crossing our fingers and hoping for the best, MTARA is one club we can join to make this mountain a safer place for ourselves.

Jo Stringfield, my contact within MTARA says, "I have made many friends in MTARA. They are always willing to help me with training, pick out equipment, include me in all their activities and help me be ready for any emergency. They are always there for me. Take a look at www.mtara.com."

Attachment 2 ARES 01/18/2022 News Article, ARES Activates as Wind-Driven Year-End Fire Destroys 1,000 Colorado Homes News

Nine Boulder County (Colorado) Amateur Radio Emergency Services (BCARES) volunteers turned out on December 30, 2021 as the devastating Marshall Fire roared through Superior and (portions of) Louisville, Colorado. Intense winds whipped a grass fire south of Boulder near Marshall into a massive firestorm that became too large and fierce for firefighters to battle.

“The only battle was evacuation, as the towns of Louisville and Superior and [the] northern suburbs of Denver lay in the fire’s wind-driven path,” said Amateur TV (ATV) enthusiast and dealer Jim Andrews, KH6HTV, of Boulder. Andrews said the only thing limiting the fire’s spread was the fact that the winds diminished by that evening.

“By that time, hundreds of homes had burned down,” Andrews said, whose own house among them. “This was not a typical forest fire, but an urban firestorm.” Thousands of people were evacuated.

BCARES Board of Directors Chairman and Region 1, District 3 Emergency Coordinator Allen Bishop, KOARK, said that a request from the Boulder Office of Emergency Management (OEM) to activate the emergency operations center (EOC) is what initiated the ARES activation. “At that time, staffing was initiated with the activation of the BCARES Radio Network, with three BCARES members assigned to the EOC,” Bishop said. The BCARES Net was promptly activated.

ARES volunteers supported communication at evacuation sites and established emergency communication as commercial power failures and preventive shutdowns by utilities caused a loss of commercial communication. “Within about 8 hours,” Bishop said, “battery back-up systems for cell phones and landlines failed, and 911 services went down.”

“To facilitate a restoration of these emergency services, BCARES activated the Mountain Emergency Radio Network (MERN),” Bishop said. Established in 2010, MERN consists of repeaters installed at fire stations in Gold Hill and Allenspark, at community centers in Nederland and Raymond, and the privately owned Airlink Repeater. “These repeaters provided the emergency communication links that facilitated the restoration of 911 communications back to the dispatch center for the duration of the power outages,” Bishop explained. The Allenspark Neighbors Emergency Network (ANEN) and Airlink (Alternate Access Radio Network) participated.

According to Bishop, as the Marshall Fire expanded, evacuation center support was requested at three locations to provide on-site situation reports using Winlink. Bishop said BCARES members and mutual-aid ARES operators from neighboring Districts established local communication with the BCARES EOC radio position from designated field locations. BCARES was activated for 2 days.

As Andrews reported, Boulder County announced on New Year’s Day that nearly 1,000 homes were lost. In addition to his own home, the fire destroyed his daughter’s home next door, as well as the homes of all his close neighbors. “We had no official warning of the coming firestorm,” Andrews said. “My only warning was from our daughter who saw it happening.” No one died as a result of the fire, but, Andrews added, “KH6HTV VIDEO, as a supplier of ATV gear, will be out of operation for a very long time to come.” Andrews edits the monthly Boulder Amateur Television Club TV Repeater’s REPEATER newsletter.

ATTACHMENT_3 REFERENCES

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2. **American Radio Relay League**, Introduction to Emergency Communication Course, 4th Edition, ARRL, 2011.
3. Amateur Radio Emergency Services https://en.wikipedia.org/wiki/Amateur_Radio_Emergency_Service, accessed online Jan 18, 2022.
4. ARRL News (on-line), ARES Activates as Wind-Driven Year-End Fire Destroys 1,000 Colorado Homes, 01/18/2022, <http://www.arrl.org/news/ares-activates-as-wind-driven-year-end-fire-destroys-1-000-colorado-homes>, accessed Feb 03, 2022.

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6. Taylor Simpson, Gainesville residents demonstrate how to use ham radios in case of severe Emergency Situations, *ABC News 2-minute video-clip 1-29-2022*, watched on-line Feb 03, 2022, <https://www.wcjb.com/2022/01/29/gainesville-residents-demonstrated-how-use-ham-radios-case-severe-emergency-situations/>.

7. ARES ®, Emergency Operations Plan by Amateur Radio Emergency Service, <https://orange-arrl.org/index.php/ares-3/>, accessed Jan 22, 2022.

8. Turner, Bob, W6RHK, ARES Orange Section Home, 2021 ARES Volunteer Statistics, <https://orange-arrl.org/>, updated Feb 02, 2022.

9. Secretarial Memorandum, Dept Agriculture, (Document describing the Farm Bill Issue as relates to Repeater Owners), June 12, 2020, <https://www.govinfo.gov/content/pkg/FR-2021-12-22/pdf/2021-27681.pdf>, accessed on-line Jan 21, 2022.

10. ARRL, Steps TO Submit An On-Line Filing, (to the FCC), <http://www.arrl.org/arrl-guide-to-filing-comments-with-fcc%23preparing>
11. FCC, Submit a Filing (ON-LINE FORM), <https://www.fcc.gov/ecfs/filings>

Attachment_4 A POSSIBLE ALTERNATIVE

An alternative suggestion: Spread out the cost over the general public, for a more equitable way of raising needed revenue to fund the stated goal. Yes, all people do benefit by having reliable TV and Internet connections. *Television networks* and *internet-based businesses* also benefit when the public pays for entertainment and products they advertise. Therefore, consider levying a tiny percentage of the profits made from marketing by TV and internet websites. That might be a less burdensome way to raise money to build desired telecommunications improvements, without harming the emergency communications infrastructure provided by amateur radio civil servants.

ALTERNATIVE (Or... never mind this ALTERNATIVE example-YOU may have your own)

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ATTACHMENT_5 SIGNATURES in Support of this Letter

Some local licensed ham radio operators in concurrence with this letter of opposition to the proposed USF fees:

- YOUR NAME HERE, Title, Call Sign, City, State, Affiliations
- Assunta, KJ6FQP, Retired Public Health RN, Riverside CA,
ARES Member West Riverside County; MTARA, MVARA, CBARC clubs
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