The Personal Radio Association

The Official Position of the
Personal Radio Association
Regarding the National SOS Network's
Proposal to Monitor Family Radio Service
Channel One in Emergencies

The Standing and Purpose of the Personal Radio Association

The Personal Radio Association is an advocacy organization supporting all users of the Personal Radio Services that are licensed and licensed by rule. Additional detailed information regarding the organization can be found at our website http://www.praweb.org . Our undertaking warrants that we take an official position on issues which affect the Personal Radio Services, especially when the public or our membership may be put in harms way or likewise benefit from an idea, project, or service. To that end, the Personal Radio Association Board of Directors takes the following official position regarding allocation of a specific Family Radio Service channel as an Emergency Calling Channel and the efforts of the National SOS Network and its supporters in the Amateur Radio Service to take specific actions to reawaken this emergency channel proposal.

In an effort to recognize the need for neighbors to communicate with one another in the event of an emergency the PRA Board also offers it's opinion on how the GMRS FRS can be used effectively in that circumstance.

The Family Radio Service, or FRS, was created to facilitate short-distance directed communication between family groups. The FRS was never intended to be an adjunct radio service to the Public Safety Radio Services, or the Amateur Radio Service. FRS is indeed a related component of the General Mobile Radio Service as seven GMRS interstitial channels are shared with the FRS. These channels are also known as FRS channels one through seven.

Neither the Amateur Radio Service, nor organizations representing their interests speak for the personal licensees of the General Mobile Radio Service or users of the Family Radio Service. Likewise, public safety organizations do not make policy or rules that control either Personal Radio Service. GMRS licensees and advocates for the license-by-rule Family Radio Service assumed this role as the Personal Radio Association in February 2005 to preserve and protect these unique and limited personal radio resources.

Members of the PRA Board of Directors include licensees in the Amateur Radio Service, current and former public safety managers, disaster planners, and personnel, former police officers and fire/medical personnel, two-way radio professionals, broadcast engineers, and long time family advocates of the GMRS and FRS. The PRA Board has the requisite qualifications to offer these opinions.

FRS Rules Applicable to this Opinion

In order to understand whether or not such a proposal makes sense one must know the FCC Rules under which the service is governed.

FRS Rule 1, 95.191: Eligibility and responsibility.

(a) Unless you are a representative of a foreign government, you are authorized by this rule to operate an FCC certified FRS unit in accordance with the rules in this subpart. No license will be issued.
(b) You are responsible for all communications that you make with the FRS unit. You must share each channel with other users. No channel is available for the private or exclusive use of any user.

FRS Rule 3, 95.193(a): provides that an FRS unit may be used to send an emergency message or conduct a brief test. Section 95.193 (d) says that users must, at all times, give priority to emergency communications messages concerning immediate safety of life or the, immediate protection of property.

Facts about the Family Radio Service

The Family Radio Service was created out of radio spectrum allocated to the General Mobile Radio Service to allow families and others license-free directed short-range communication while engaged in group activities like camping, hiking, shopping or visiting amusement parks. The FCC has also allowed businesses of all kinds to use FRS radios during the course of daily operations. Recently the FCC has even approved Garmin GPS devices as well as children's toys for digital text-messaging for use in the Family Radio Service.

The public's expectation has already been set that FRS and GMRS radios are intended for directed communication within family or other groups with no expectation that the radios will be used to communicate with anyone else for any other purpose. There are millions of these radios used every day across the United States.

The FRS also allows for the use of so-called radio "privacy codes" (tone coded squelch) to prevent radios from hearing other radios outside the intended group. Even though there is a requirement to monitor before transmitting, users rarely if ever do so.

Many users of FRS are children, as well as adults who often lack an awareness of the FCC rules or knowledge of how a radio works.

The FCC's FRS Rules, technical specifications, the laws of physics as applied to the propagation of radio waves, as well as how the millions of FRS radios are used today by the general public, played a significant role in the development of this opinion. The Board of Directors of the PRA and its members continue to deal with severe problems associated with the FRS that will also continue to limit its effectiveness in an emergency under the current rules.

Please read these FCC Rules:

95.601 – Basis and Purpose
95.603 – Certification Required
95.627 – FRS unit channel frequencies
95.639 – Maximum Power
95.647 FRS unit transmitter antennas
95.649 – Power Capability
95.637 – Modulation Standards
95.653 -- Instructions and Warnings

Some facts about the Family Radio Service:

1. The output power of an FRS transmitter is limited to one-half watt. This one-half watt is applied to an extraordinarily inefficient antenna giving the user an Effective Radiated Power of far less than one-half watt. The FRS receiver is equally challenged with the poorly performing antenna.

2. UHF radio waves are heavily absorbed by vegetation and reflected by buildings and large objects.

3. UHF radio waves travel line-of-sight. Terrain, large objects, and absorption severely limit the distance a UHF radio wave can travel. How the user holds the radio to orient the radio antenna can have a profound effect on the received signal at the other end of the radio circuit.

4. The actual usable range of an FRS radio is FAR LESS than that claimed by manufacturers. In most cases, useful communication is within a few city blocks at best and not within a two-mile range as often claimed.

5. The required 2.5 KHz frequency deviation of an FRS radio also limits range as well as interoperability with GMRS to some degree.

6. FRS Rules regarding channel sharing are largely ignored by the general public and the businesses that use FRS. It is common to hear a business attempt to chase away other users on the same channel. Families routinely talk over other users, children sing and play

on their radios, adults use off-color language, and many simply make a game of annoying others. Call tones are used to cause intentional interference and annoy others despite regulations limiting the use of such tones (95.193(b).

7. There is now complete anarchy on the FRS channels. It has been made even more chaotic through the unilateral deleterious actions of the FCC Wireless Telecommunications Bureau allowing F2D digital emissions for text messaging. The usefulness and practicality of FRS in urban areas is already in question and expected to get much worse with the proliferation of the Hasbro text messaging toy marketed to children in the 2005 Christmas buying season..

8. Despite the Commission's early claims to the contrary, FRS transmissions have and do cause severe interference to GMRS stations. Repeaters are activated by poorly tuned FRS radios and adjacent channel activity can render a GMRS system in some areas completely unusable.

9. Dope dealers, burglars, and child molesters use FRS radios during the commission of crimes. Bad people use these radios too. Text messaging toys are expected to add yet another layer of criminal complexity by further enabling the anonymity of criminals using radios in the commission of a crime or as a tool to lure children into a sexual adventure.

10. The proposed national emergency channel, FRS Channel 1, is perhaps the most frequently abused channel of the FRS.

11. There is a complete lack of radio discipline, by children and adults that use the Family Radio Service. Some sort of decorum is normally required in a radio service where emergency radio monitoring takes place. Pre-channel monitoring does not occur. Use of coded squelch is common and few persons ever figure out how to change or disable these tones on demand. FRS radios are used like toys and considered by many to be toys!. A total lack of radio-related discipline precludes using FRS for anything but a limited-use and close-in directed communications service.

12. The general public has no current expectation that they will ever talk to anyone outside of their immediate group. Some parents talking actually become quite agitated if others begin using the same frequency and attempt to talk to their children. Most, if not all owners of these radios purchased the radios to talk to family members during family activities. Most people do not scan or listen to FRS channels waiting for an emergency in the vicinity of their receiver.

13. Transmitter power is less important than antenna height. Transceivers at higher elevations will be overcome with radio signals while transceivers at the lowest altitudes will hear fewer signals.

14. The FCC has already rejected an FRS 1 Emergency Channel request for rule making.

In an independent assessment, PRA members of the Lakes Area GMRS Repeater Group in Wisconsin conducted monitoring from three monitoring stations (one urban, one rural, and one suburban) over a one-month period with one hundred hours of total monitoring time. The Lakes group found children were playing on the GMRS/FRS radio almost 72% of the time. An adult used the radio only 28% of the time. Furthermore, the FRS radios monitored employed CTCSS (Continuous Tone Coded Squelching System) or "privacy codes" on 92% of the transmission to keep their speakers quiet, making chances of being heard 8% or less.

PRA Position One: Emergency Radio Use of the Family Radio Service

An FRS emergency channel designation is impractical on its face. The Personal Radio Association believes that the FCC Rules already create the standard framework around which a true emergency message can be passed within members of a group using FRS radios. Given the current behavior of people that use the FRS, it is quite possible an emergency message will be interfered with and thus delayed either intentionally or unintentionally. We do not believe that an emergency-channel declaration by the Commission or channel monitoring by Amateur Radio operators will make passing emergency messages easier or even more likely. The FRS was never intended to have a wide ranging public emergency application or an affiliation with the Amateur Radio Service or the Public Safety Radio Service. The facts about the FRS preclude such use except in a limited way as part of a community communications emergency plan.

The PRA advocates that persons requiring emergency assistance carry and use a cellular telephone or use a land-line telephone to summon help. The use of FRS should be avoided unless there is a communications plan in place that can, with a guarantee under any given circumstance, relay a message by telephone or radio to a public safety agency.

The PRA believes that twenty-four by seven three hundred sixty five day per year FRS emergency channel will fail as few if any persons will ever be heard making an urgent broadcast for assistance. The PRA maintains its stance that no emergency-only or designated-channel rule be considered by the FCC or by private public-service organizations. The PRA cannot approve, support, or endorse any emergency channel declaration without adequate planning and training. The PRA does support disaster preparedness communications planning by local jurisdictions that incorporate very-local use of FRS and GMRS into a neighborhood communications plan where public expectations are properly set as to the who, what, where, when and how radios can be used in that plan.

Position Two: The National SOS Radio Network

The PRA studied the National SOS Radio Network website http://www.nationalsos.com. The site author recommends that the general public purchase FRS radios and use them during an emergency to call for help. National SOS cites Hurricane Katrina as a prime

example where such a system might have saved lives. In this presentation National SOS never explicitly says the idea is triggered entirely by major disaster events. We see in the presentation a clear implication that FRS channel one would be monitored on a twenty-four-by-seven basis for any emergency anywhere.

The idea's originator, Eric Knight, holder of Amateur Radio call sign KB1EHE, writes on his site the following major points when describing the National SOS Network concept:

> 1. Our goal is simple: To help create an easy, reliable, accessible-by-all emergency communications system.
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> 2. The National SOS Radio Network is based on the millions of Family Radio Service (FRS) radios already in use for camping, boating, hiking, etc., and the nationwide network of 650,000 ham radio operators -- people renown & prepared for emergency communications. The result: Instant, reliable crisis communications.
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> 3. In an emergency situation: Citizens tune your FRS radios to Channel 1 and transmit your emergency messages. Ham radio operators tune to 462.5625 MHz (the frequency that corresponds to FRS Channel 1) and relay the emergency messages to police & fire departments, and national rescue & relief agencies.
>
> 4. Flood hurricane or natural disaster, call SOS. Connects the millions of low-cost family radio service radios in use by the public with the always prepared network of 650,000 amateur "ham" radio operators across America.
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> 5. In the aftermath of Hurricane Katrina, it's become clear that a major contributing factor to the tragic loss of life was the near total breakdown of communication systems. Once electricity, telephone, and cell phone services failed, people were unable to let rescuers know of their dire situation...and died as a result.
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> 6. A simple, instant, and virtually zero-cost solution: A "National SOS" public emergency network that connects millions of Family Radio Service (FRS) radios already in use by the public with 650,000 amateur "ham" radio operators -- people renown and prepared for emergency communications. The output frequencies of FRS radios are easily received by the radio gear hams use daily. That's the magic link in this emergency communication strategy. The National SOS Radio Network wouldn't require new laws or any new legislation. It could go into effect, immediately. Once the ham radio community is made aware to listen for the public's emergency broadcasts on an FRS frequency, the national network will be up and running. FRS radios don't require a license, can be used by anyone of any age, and are available for as little as $10 - $15 at many retailers such as Wal-Mart www.walmart.com. FRS radios can transmit 2 – 8 miles (terrain dependent). And there are hams in nearly every community in America. (To see

how many ham radio operators are in any town, visit www.qrz.com/i/names.html and type in a zip code.)

7. The National SOS Radio Network needs your help to make it a reality. Click here to visit our newly expanded Discussion Forum. The beauty of the National SOS Radio Network is that it could spring into existence -- today -- without any laws or legislation. All it needs is awareness. Imagine a communication system that can start saving lives...right now...and is built upon the public's own desire to do so. No red tape. No training. No bureaucracy. This idea is "freeware". Saving lives is too important to profit from. We'd like to invite anyone and everyone with thoughts on how to bring this concept to life to visit our online Discussion Forum by clicking here. This is an all-volunteer effort. Thanks, in advance, for your ideas! Spread the word!

8. This Web site of information about the National SOS Radio Network is a public service of UP Aerospace, Inc. www.upaerospace.com Eric Knight, UP Aerospace's CEO, is a 30-year ham radio veteran (KB1EHE). He's seen the great things ham operators can do -- including pitching in during disaster-relief efforts. To help spread the word to fellow hams, Eric plans to approach the American Radio Relay League ("ARRL", www.arrl.org), the national membership association for amateur radio operators. Said Eric, "The ARRL is a wonderful organization. They knit the ham radio community into a network that fosters education, technology experimentation, and emergency preparedness and assistance. With a positive word from the ARRL, the National SOS Radio Network could spring to life immediately." The National SOS Radio Network is a natural extension of the overall mission of UP Aerospace: To provide the public with a broader access to important services. We pride ourselves on providing low-cost access to space -- particularly for the nation's college and university students. Likewise, through the National SOS Radio Network, the public can have immediate, life-saving access to emergency and rescue resources.

9. The concept for the National SOS Radio Network is in its infancy. Yes, you could say that the network is "operational" -- as it doesn't require any laws or specific effort to put it into action. However, the reality is that it needs awareness for it to be truly effective.

If you have ideas and suggestions, please join our discussion forum by clicking here. Or, if you'd simply like a general way to contact us, use contact@NationalSOS.com. You can also send postal mail to: National SOS Radio Network c/o UP Aerospace, Inc. P.O. Box 600 Unionville, CT 06085 U.S.A. Why would an aerospace company donate its resources to help with public communications? Simple: Because we care deeply about the communities we serve.

National SOS Proposal Issues of Concern

Amateur Radio operators have historically provided emergency communications in wide-spread disasters and other localized emergencies. The Amateur Radio Service is afforded a huge number of radio frequencies across a wide and varied frequency spectrum for handling emergencies from a few miles away to many thousands of miles away. The Amateur Radio Service has, as one of its FCC license requirements and obligations, that the service be used to assist communities in times of communications emergency. Amateur Radio operators are selfless volunteers and have trained themselves to provide emergency communications for others. Most, if not all Amateurs involved in emergency communications function as part of a local, regional, state, or national multi-hazard functional disaster plan.

The National SOS Radio Network wants to take advantage of the Amateur's ability and training by asking them through the Amateur's American Radio Relay League to monitor FRS channel one for emergency traffic. National SOS describes this as, "*Instant, Reliable crisis communications.*" The suggestion is seriously flawed as presented. The major flaw, as we see it, is that the public can take advantage of the idea right now with no training, no plan, nor any familiarization whatsoever.

The PRA supports realistic and rational emergency planning of all communication resources including the Personal Radio Services. The PRA does not support the National SOS program as we find inherent flaws which could result injury and perhaps even death. As proposed, there is a high propensity for failure that also has a high propensity for litigation from person(s) expecting help and who were unable to summon help.

Issue Number 1: Neither reliable or instant.

The National SOS proposal calls for Amateur Radio volunteers to monitor FRS channel one and relay calls for help from citizens to the authorities. The scope of this effort defies imagination. The idea requires more Amateurs than are typically available to jurisdictions for the disaster communications Amateurs already provide. To make this idea work, a very large and unattainable number of Amateurs would be required. Not all of the Amateurs in the United States participate in disasters. Not all Amateurs have radio equipment even capable of receiving the Family Radio Service frequencies.

The author of the proposal is also forgetting that the rescue of, or emergency services for, individuals in an emergency zone are not and never have been instantaneous. This demonstrates a serious misunderstanding of the role emergency services play just after a major disaster occurs. This single important fact reflects very poorly on the possibility of the plan's success!

In communities that anticipate and plan for disasters, residents are often warned that police, fire, medical, and even search and rescue will NOT be immediately available – particularly if residents REFUSE to evacuate. Triage is in effect after a major disaster.

Persons in disaster areas are often responsible for their own fate in the first seventy-two hours or more! Even the American Red Cross will not conduct health and welfare messages in the first critical hours of an emergency. Having an FRS radio at your disposal is NOT going to change that fact! A citizen could call for help until their batteries are dead and never be heard. Emergency services are NOT going to respond to calls from individuals with FRS radios when they have publicly said they will not respond to calls made by telephone!

FRS radios in an average environment may only reach from a few city blocks to a quarter of a mile reliably. Radios located in buildings may not carry more than a few hundred feet. A city of fifty square miles might need two-hundred Amateurs or more to provide one hundred percent coverage. This number alone immediately disqualifies the program as reliable and instantaneous. Furthermore, access to a disaster area is usually severely restricted or closed by government and public safety officials, which further exacerbates access for communications volunteers.

The activities of most volunteers are written in disaster plans far in advance of an emergency. Most of these plans recognize that certain types of volunteers are not available instantly because volunteers have families, real jobs, and also suffer during disasters. There are also neighborhoods with no Amateur Radio operators. What are citizens in those neighborhoods going to do when they reach for their radios and hear no response to their pleas for help?

How could such a scheme help neighbors that live close to one another? A homes association, building association, neighborhood association, or crime prevention group could arrange ahead of time to equip neighbors with FRS radios so that they could communicate with each other during an emergency. Planning, training, and expectation setting are the key elements to making this alternative approach work. None of these elements are included in the National SOS proposal that we can find. In fact the proposal intentionally overlooks training and expectation setting.

More and more communities have volunteers training under the FEMA CERT program. CERT volunteers are trained to provide assistance to their neighbors ahead of the arrival of emergency services. As long as there has been pre-planning and everyone has an idea of what to expect, and as long as everyone that has a radio understands the limitations of the radios and the probability of a response such use of FRS could benefit CERT volunteers making an urgent assessment of a neighborhood immediately after a major disaster. The PRA can support pre-planned use of FRS and GMRS in a very-local way by neighborhood groups focused on checking the welfare of neighbors during or after an emergency.

Issue Number 2: Involving the American Radio Relay League

The American Radio Relay League speaks for member Radio Amateurs in the United States. Not all Amateurs are members of the ARRL. The ARRL does not speak

for GMRS licensees or the users of FRS. The Personal Radio Association was created to represent its members that are GMRS licensees and users of FRS, MURS, and CB radios. The FRS is outside the ARRL span of control. The ARRL, to our knowledge, has not weighed in on this proposal. The PRA welcomes communication from the ARRL regarding any proposal from their organization that might involve the Personal Radio Services but we do not see the ARRL as the organization that can certify the National SOS proposal as does the proposal's author.

Issue Number 3: Petitioning the FCC to Allow Modified Amateur Radios on GMRS and FRS.

It is illegal for an Amateur Radio operator to make a modification to a radio transceiver certified for use under the Amateur Service regulations, FCC R&R Part 97. Unfortunately, and despite the National SOS author's claim to the contrary, many Amateurs have made the illegal conversion as evidenced by the use of such equipment at Hamfests and in other areas of the country where Amateurs have accessed GMRS repeaters using their Amateur call signs thinking they were allowed to do so.

The author of the proposal supports petitioning the FCC to allow Amateurs to modify their radio equipment to use GMRS and FRS frequencies for the purpose of communicating with citizens on the FRS emergency channel. The PRA sees no valid reason to make such a petition. Many Amateurs and their families already use GMRS and these families have invested thousands of dollars in the purchase of commercial-grade radio equipment for use under Part 90 and Part 95 of the FCC Rules. It is an inappropriate suggestion to allow modified Amateur Radio equipment on GMRS and FRS when that equipment is not designed for use so far out of the recognized Amateur Radio UHF spectrum.

Another Amateur on the National SOS bulletin board suggests that Amateurs get "automatic GMRS rights" on their Amateur licenses. This is a ludicrous suggestion. The GMRS is a separate radio service that has nothing to do and frankly very little in common with the Amateur Service. There is no demonstrated need to warrant such a proposal.

The PRA Board is concerned with the site owner's reluctance to manage discussions within the existing FCC rules. Entertaining suggestions that modifications to Amateur radios be allowed to accommodate Amateurs use of another radio service for a purpose of questionable value is intolerable and only encourages the rationalization that making illegal radio modifications is acceptable.

Issue Number 4: The Plan Suddenly Changes

The National SOS plan suddenly changes as you dig deeper into the site's forums. The author of the site is quoted as saying: "The SOS radio service would be a reaction to a specific event in a specific area -- not a full time national 911. No one would have to

monitor continuously. As you said, it will be obvious to everyone when a real emergency occurs (hurricane, tornado, flood, blizzard, etc.). The key is to apply the ol' K.I.S.S. principle...and keep the implementation ultra simple. That's the essential ingredient to the public's adoption of the plan...and its ultimate success."

This contradicts the site owner's slick web-based presentation or at best his original intent is not made clear. He does however reiterate his desire to set the public's expectation that immediate help is available through the use of an FRS radio with no training or planning.

Again we believe, that the plan as described is doomed to failure unless it is part of a local disaster plan and the neighbors who own and want to use radios know what to expect. It is irresponsible to suggest anything else. We also feel that if the proposal is event based the author should stick to that premise rather than create the expectation that FRS Channel 1 is monitored continuously. The author is not consistent in his presentation and is confusing his audience!

Issue Number 5: The Author Appeals to Base Emotions

We find it discouraging that the author supports an obviously unworkable suggestion by appealing to emotion rather than the facts and good disaster planning practices. In his forum he describes those that disagree with him as negative and having no solutions. The PRA has offered him our solutions for using FRS and GMRS and we also include those suggestions in this opinion. Our Board members have engaged him on his website and the PopularWirless.com website forums.

The author of the National SOS plan says, "We appreciate all comments, both positive and negative. It's easy to "oppose" anything. The hard part is coming up with solutions to real problems. Over a 1,000 people died from Hurricane Katrina. That's the very sad fact. All of us here are trying to figure out ways, using existing and low-cost means, to save lives. It will take fresh thinking to do so. After all, the old-school, leave-it-as-it-is thinking led to countless deaths from starvation and dehydration. America can -- and must -- do better for its own people. And do so before the next catastrophe strikes."

This statement reflects what may be a lack of knowledge of the facts. Residents of that area were warned to leave. Many chose to stay and doomed themselves. Help was days away as we have seen. State and local officials failed in their emergency response, some police even deserted their posts, and the sheer scale of the response needed to deal with the disaster was **unmeasured in human history.** The suggestion that FRS radios used in the fashion described by National SOS might have made a major difference is frankly not very helpful. It is illogical on its face and it is extraordinarily misleading. Better planning would have helped. Getting the people out of harms way would have helped. Better communication between FEMA and State officials would have helped. Our objection to the National SOS proposal as presented has nothing to do with old-school leave-it-as-it-is thinking.

Issue Number 6: REACT does not speak for GMRS and FRS

The National SOS project author has said in his forum, “We are in very close contact with the senior executives and planners at REACT, REACT has a long history in the emergency-communication realm -- and the last thing we want to do is "reinvent the wheel". We're hoping that we can develop some synergistic plan that combines the best of ALL ideas -- REACT, Ham /ARRL / ARES / RACES, etc. -- to achieve the goal we all have: a truly effective emergency communication plan that saves lives.”

REACT does not speak for all GMRS licensees or the users of FRS radios nor do they reach the general public to the degree CERT volunteers do. REACT is welcome, as is any group, to discuss this proposal or any other proposal with GMRS licensees in open forums or via rule-makings with the Personal Radio Association. Many individual REACT members are members of the PRA. GMRS is a radio service of individual licensees and not of organizations.

Issue Number 7: Allowing Amateurs to Modify Non-Type Approved Equipment

The National SOS project author apparently encourages discussions regarding petitioning the FCC to allow Amateurs to modify Amateur Radio transceivers to use GMRS and FRS. The author said in his forum replying to an Anonymous user, “Anonymous wrote: It is also illegal to use modified ham equipment. Period. You want to "SOS", use the appropriate type accepted equipment. I see no basis or need for any of these suggestions.

The site sysop wrote, “You've missed the point. The author did NOT suggest modifying ARS equipment. We all know that's not legal. The author said that the FCC should be petitioned to change the current laws. If the FCC should happen to modify certain laws down the road, then no laws would be broken. BTW, in my 31 years in the amateur radio hobby, I've found that hams are some of the most law-abiding people I've ever met. Their self-policing of radio behavior and letter-of-the-law operation make me proud to be part of ham community.”

The Board of Directors of the PRA has found that there are enough Amateurs modifying their UHF radios to access GMRS and FRS with non type approved equipment to already be a major concern. This is a contradiction to the author’s statement. We are also very concerned that the author apparently encourages discussions advocating the modification of non type accepted equipment for operation so far outside the Amateur allocation.

Issue Number 8:

The National SOS author supports delicensing of GMRS. We cannot under any circumstances support an organization advocating such a position. Complete anarchy will

be the end result of license-by-rule. The Citizens Band, the Family Radio Service, and the Multi-Use Radio Service already suffer under license-by-rule.

Issue Number 9:

The author of this proposal originally made no effort to involve the licensees of the General Mobile Radio Service with his idea. To his credit he has visited the website most frequented by GMRS licensees and that is the home base of the Personal Radio Association. It was late, after the fact, but nevertheless appreciated.

GMRS licensees have access to FRS channels 1-7 as those channels were once exclusive to GMRS. These channels remain a significant part of the General Mobile Radio Service. Regardless of this, we still find that the National SOS does not encourage others to license in the GMRS but rather encourages license-by-rule.

A properly managed disaster communications program at local levels could be a great asset to the GMRS community, Most GMRS licensees would participate especially if the proponents had a view of GMRS shared among GMRS licensees. Disaster planning might be taken more seriously by even more people. There are major benefits to GMRS licensing that the National SOS completely overlooks. As an example, those with GMRS licenses are allowed external antennas and five watts ERP on FRS channel one. The PRA sees possibilities for CERT and local crime prevention groups that use GMRS and FRS appropriately. We also believe local jurisdictions can and will plan for the proper use of FRS and GMRS despite the National SOS.

Issue Number 10:

The intent of the program is to keep it simple, thus the apparent absence of the many critical elements of success. When it comes to saving lives, simple is not always the best tactic and although the effort itself may look simple, it should not be portrayed as simple. It is anything but simple. Planning required for a program like this to be effective. The PRA believes any undertaking of this type must be investigated, planned, and rehearsed before it goes public. When it goes public emergency planning agencies must set the public's expectations properly.

Through the use of its snazzy corporate-sponsored website the National SOS proposal looks like the proposal people want. The presentation is impressive. It might even sound great to the person who doesn't know all the facts. The PRA wants to make sure those licensees in the GMRS and the users of FRS do know better.

Suggestions of the PRA for Emergency Use of FRS

We want to reiterate our ideas for a workable program that uses GMRS and FRS.

1. Participants using GMRS should license in GMRS. Planning should include GMRS licensees. There should be an effort to license families in America's neighborhoods that want to help each other during or immediately after an emergency.
2. Encourage local jurisdictions to have an FRS GMRS communications plan within the existing FCC Rules governing both services. These jurisdictions should locate and negotiate with all GMRS resources.
3. National SOS, REACT, the PRA, and other GMRS based organizations can create a committee to explore the appropriate use of the FRS in an emergency. Together these groups should support, community based disaster communication plans and work within those plans to provide public emergency communications.
4. The public needs informative packets, and training information. No program will work without training. This would include extremely basic radio instructions, storage of spare batteries and supplies. Such training should be provided through local offices of emergency management or groups with CERT affiliations.
5. Eliminate the public expectation that the National SOS website now sets that FRS channel one can be used in any emergency to summon assistance on demand.
6. Disaster communications planners, while taking into consideration the limitations of GMRS and FRS should:
    a. Share with neighborhoods the benefits of communicating after an emergency to assess the welfare of persons by radio in a very local way.
    b. The need for a neighbor or neighbors to learn how to effectively use a two-way radio during and immediately after a disaster.
    c. Encourage neighbors to use radios with coded-squelch disabled.
    d. Develop local ways for neighborhoods to communicate with OES/OEM officials.