

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
DELETE, DELETE, DELETE)
)
REPLY COMMENTS)
And Request For)
PETITION FOR RULE MAKING)
)
Requesting Modification with Reallocation)
of Frequencies of FCC Rules & Regulations:)
)
47 CFR § 15.233)
[Operation within the bands) **GN Docket No. 25-133**
43.71-44.49 MHz, 46.60-46.98 MHz,)
48.75-49.51 MHz and 49.66-50.0 MHz])
)
47 CFR § 15.235) **RM - _____**
[Operation within the band 49.82-49.90 MHz])
)
And)
)
47 CFR § 22.531)
[Public Mobile Radio Service Paging Channels])
)
To Reallocate Underutilized or Abandoned)
47 CFR Part 15 46/49 MHz Cordless Telephone,)
49 MHz Low Power Walkie-Talkie, and)
47 CFR Part 22 VHF Low Band Public Mobile)
Radio Services (PMRS) Paging Channels to)
the General Mobile Radio Service (GMRS))
and Family Radio Service (FRS))

**REPLY COMMENTS
And
PETITION FOR RULE MAKING**

Submitted by:

National Capitol Communications, LLC

**Jack Ramberg – President
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April 25, 2025

I.

INTRODUCTION

Before the Federal Communications Commission (FCC or Commission) is a Notice of Proposed Rulemaking (NPRM) proposing action to promote the policies outlined in Presidential Executive Order 14192 of January 31, 2025, Unleashing Prosperity Through Deregulation, 24 Fed. Reg. 9065 (Feb. 6, 2025) and 14219 of February 19, 2025, Ensuring Lawful Governance and Implementing the President’s “Department of Government Efficiency” Deregulatory Initiative, 36 Fed. Reg. 10583 (Feb. 25, 2025). Specifically, these REPLY COMMENTS are in response to submitted COMMENTS submitted regarding requests for the allocations of additional frequencies to 47 CFR § 95.1763 [GMRS Channels] and the request for issuance of a PETITION FOR RULE MAKING to reallocate underutilized or abandoned 47 CFR Part 15 46/49 MHz Cordless Telephone & 49 MHz Low Power Walkie-Talkie/Baby Monitor frequencies and Part 22 VHF Low Band (PMRS) Paging Channels to the GMRS and 47 CFR § 95.563 [FRS channels].

II.

COMMENTER QUALIFICATIONS

Commenter/Petitioner is National Capitol Communications, LLC (NCC) and Mid Atlantic REACT. Mid Atlantic REACT is a chapter of the greater REACT International organization.

NCC membership includes professionals from Public-Safety, Medical, Microwave, RF Engineering, and Land Mobile Radio (LMR). NCC members are Commission licensed in the Amateur Radio (ARS), Business Radio (BRS), General Mobile Radio (GMRS), Special Emergency Radio (SERS), and LMR services. NCC members have also taken examination for and has been issued the Commission's commercial GMDSS Radio Maintainer, GMDSS Radio Operator, and General Radiotelephone Operator Licenses. NCC possesses a BRS license in the VHF Low Band.

It is with the NCC membership having the above extensive expertise in dealing with personal, business, medical and emergency/public assistance communications matters that this Commenter/Petitioner is qualified to submit the following timely filed REPLY COMMENTS in response to this NPRM with a request for issuance of a PETITION FOR RULE MAKING (Petition).

III.

REPLY COMMENTS

Comments have been submitted requesting additional spectrum/frequencies be added to the GMRS. One Commentor proposed “opening the entire 462 – 467 band of frequencies for GMRS.” Another Commenter requests “expanding the GMRS and MURS frequency ranges.” A few Commenters are requesting “allocating new channels for experimental DMR (Digital Mobile Radio) use within the GMRS service, fostering technological advancement and innovation.”

Regrettably, any expansion of the GMRS both within and outside the 462 – 467 MHz band is not feasible due to these channels currently being heavily used by Public Safety (Police, Fire, EMS, SERS/Medical) and therefore would not be available for reallocation. Similarly, reallocation of VHF High Band (160 – 170 MHz) frequencies would also be difficult due to Public Safety and Governmental use.

But what is available for reallocation is significantly underused and abandoned VHF Low Band (30 – 50 MHz) frequencies. And it is these VHF Low Band channels, which include the 47 CFR Part 15 46/49 Low Power MHz Cordless Telephone & 49 MHz Low Power Walkie-Talkie/Baby Monitor frequencies and 47 CFR Part 22 VHF Low Band (PMRS) Paging Channels, that is the nidus and impetus for the request for this PETITION FOR RULE MAKING.

IV. PETITION FOR RULE MAKING

The date is September 26, 2024, 11:10 PM and “Mother Nature” is about to unleash her wrath upon the panhandle of Florida. The eye of Hurricane Helene, a Category 4 storm, has made landfall near Perry, Florida. Winds were clocked at 140 mph. Within 24 to 48 hours, Hurricane Helene, now a Category 1 storm, unleashed torrential rain that literally destroyed small towns in western North Carolina, with the hardest hit being Asheville, NC.

The hurricane wipes out all cellular communications facilities in western North Carolina. Countless of people need rescue. Dozens of lives had been lost and hundreds of more lives would be lost. ARES, the Amateur Radio Emergency Service, goes it effect. But their main local communications repeater, the W4KEV 145.410 machine located on Viking Mountain in Greene County, Tennessee, was also knocked-out and amateur operators worked hard to get the repeater back up and running.

In a television interview days after the hurricane hit that region, Governor Roy Cooper of North Carolina stated,



“We are surging search and rescue teams to help rescue people who are still stranded but can’t communicate because cell phone service is down.”

As stated by Governor Cooper, during the time of significant communications “black-out,” no communications capabilities were available for the average, non-amateur, citizen to transmit a signal that could propagate a signal far enough beyond “line-of-site,” which is the case for the UHF FRS/GMRS and VHF High MURS, outside of the devastated area to get the help needed to prevent further deaths.

But what if 35 – 50 MHz VHF Low Band frequencies were available, both hand-held and mobile, that could transmit signals with a propagation beyond “line-of-site” that could be heard a significant distance from the devastated area without the need for mountaintop Amateur or GMRS repeaters.

This Petition hereby proposes such a 35 – 50 MHz allocation to the current GMRS and FRS using reallocated VHF Low Band channels, which include the 47 CFR Part 15 46/49 Low Power MHz Cordless Telephone & 49 MHz Low Power Walkie-Talkie/Baby

Monitors and Part 22 VHF Low Band (PMRS) Paging Channels, to create the capability of average citizens to be able to communicate beyond “line-of-site” for both personal and emergency communications.

The precedent has already been established by the Commission for the reallocation of frequencies from other radio services to the 47 CFR Part 95 Personal Radio Service (PRS). This occurred in the Report & Order (R&O) in WT Docket 98-182 (FCC 00-235, Adopted June 28, 2000, 15 FCC Rcd 16673 [2000]) and reaffirmed in the Memorandum Opinion and Order (MO&O) in WT Docket 98-182 (FCC 02-139, Adopted May 2, 2002) which reallocated “five VHF (High) frequencies that were formerly licensed under Part 90 for low-power, industrial/business use, by placing (the) frequencies in a new Part 95 PRS service named the Multi-Use Radio Service (MURS).” Thus, this Petition’s request for such a reallocation of 30 – 50 MHz frequencies is with existing precedent.

A. Reallocation of 43 – 49 MHz Range Cordless Telephone Frequencies

43 – 49 MHz cordless telephones were extremely popular in the 1980’s. However, since that time, cordless telephones have significantly evolved with digital technology and operations in the 900 MHz and 5.8 GHz bands. Currently, this Petitioner is unaware of any manufacturer producing cordless telephones in the 43 – 49 MHz range. Thus, these 43 – 49 MHz frequencies are essentially no longer being used for cordless telephones.

Below is a post analysis chart, using the FCC’s Universal Licensing System (ULS) database, of the old 43 – 49 MHz cordless telephone frequencies that are currently in use by 47 CFR Part 90 licensees. As can be see below, channel pairs 1 – 16 currently have active 47 CFR Part 90 licenses assigned to those frequencies.

But of interest is that the 10 channel pairs, channels 16 – 25, have NO active 47 CFR Part 90 licenses using these frequencies. Thus, these frequencies have essentially been abandoned and are available for reallocation.

47 § 15.233(2) – Cordless Telephone Frequencies with # Active FCC Licenses

Channel	Base Tx Frequency (MHz)	Base Frequency # Active Licenses	Handset Frequency # Active Licenses	Handset Tx Frequency (MHz)
1	43.720	5	20	48.760
2	43.740	5	13	48.840
3	43.820	1	31	48.860
4	43.840	6	9	48.920
5	43.920	3	45	49.020
6	43.960	4	12	49.080
7	44.120	1	14	49.100
8	44.160	5	7	49.160
9	44.180	2	30	49.200
10	44.200	2	16	49.240
11	44.320	5	9	49.280
12	44.360	4	1	49.360
13	44.400	1	11	49.400

14	44.460	4	16	49.460
15	44.480	3	14	49.500
16	46.610	0	0	49.670
17	46.630	0	0	49.845
18	46.670	0	0	49.860
19	46.710	0	0	49.770
20	46.730	0	0	49.875
21	46.770	0	0	49.830
22	46.830	0	0	49.890
23	46.870	0	0	49.930
24	46.930	0	0	49.990
25	46.970	0	0	49.970

Upon such a reallocation, these paired channels could be established for both simplex and repeater operations. Below is a revised chart with channel pairs 16 – 25, rearranged and renumbered as 01 – 10, illustrating such a reallocation to the GMRS.

Proposed New 47 § 95.1763(e) & (f) – 46.610 - 49.990 MHz 100-Watt GMRS Allocation

Channel	Mobile Frequency (MHz)*	Base or Mobile Frequency (MHz)
01	46.670	49.830
02	46.710	49.845
03	46.730	49.860
04	46.770	49.875
05	46.830	49.890
06	46.610	49.670
07	46.630	49.770
08	46.870	49.930
09	46.930	49.970
10	46.970	49.990

*These frequencies are for use only as repeater input frequencies

This proposed 46.670 – 46.970 MHz & 49.830 – 49.990 MHz reallocation of former cordless telephone frequencies would be assigned to the GMRS as licensed, up to 100-watt, duplex repeater channels. As with the GMRS, the output repeater frequencies would also be available for simplex operations.

B. Reallocation of Low Power Device Channels in the 49.830 – 49.890 MHz Band

Low power (LP) devices, such as LP walkie-talkies and baby monitors, had also been using the 49.830 – 49.890 MHz band and were also prominent in the 1980’s. But as with cordless telephones, LP 49 MHz baby monitors have evolved now using 900 MHz digital technology and LP 49 MHz walkie-talkies are now considered “antique” historical collectable items sold on eBay. Thus, these frequencies are underutilized or have essentially been abandoned and are available for reallocation.

The chart below shows the current LP device frequencies in the 49.830 – 49.890 MHz band:

47 § 15.235(c) – Operation within the band 49.830 – 49.890 MHz

Low Power Walkie-Talkie / Baby Monitor Frequency Table	
Channel	Frequency (MHz)
1	49.830
2	49.845
3	49.860
4	49.875
5	49.890

This proposed 49.830 – 49.890 MHz (6 Meter Band) reallocation of LP device frequencies would be assigned to the FRS, under a new 47 § 95.563(b) as un-licensed, up to 2.0-watt, simplex channels. As with the current UHF GMRS/FRS, these new FRS 6 Meter band channels 1 – 5 would be co-shared with the new higher-power GMRS 46.610 - 49.990 MHz (6 Meter band) channels 1 – 5 repeater and simplex licensed operations.

C. Reallocation of 47 CFR Part 22 PMRS VHF Low Band Paging Frequencies

Over the decades with the advancement of technology and expansion of the VHF High, UHF, and 900 MHz bands, commercial users needing paging services have migrated to these higher frequencies, and many having switched totally to cellular, for such services resulting in the underutilization and abandonment of the PMRS VHF Low band paging frequencies. Thus, these PMRS underutilized or abandoned paging frequencies, which were not subject to 47 CFR § 22.201 – Competitive Bidding process, would be available for reallocation.

This proposed 35.20 – 35.66 MHz & 43.20 – 43.66 MHz region reallocation of PMRS VHF Low Band PMRS paging frequencies would be assigned to the GMRS as licensed, up to 300-watt 8 MHz separation, paired repeater channels.

The below chart reveals the 47 CFR § 22.531 PMRS VHF Low Band paging frequencies that have been identified, using the FCC’s ULS database, as either underutilized or abandoned that would be available for reassignment to the GMRS, and of which again would not subject to the 47 CFR § 22.201 – Competitive Bidding process.

47 CFR § 22.531 Channels for paging operation

Channel	Mobile Tx Frequency (MHz)	Mobile Frequency # Active Licenses	Base/Mobile Frequency # Active Licenses	Base/Mobile Tx Frequency (MHz)
11	35.260	0	0	43.260
12	35.300	0	0	43.300
13	35.340	1*	0	43.340
14	35.380	0	0	43.380
15	35.420	0	0	43.420
16	35.540	0		
17	35.660	0	0	43.660

* Only licensee on the frequency is in the Virgin Islands

Upon such a reallocation, these paired channels could be established for both simplex and repeater operations. Below is a revised chart with channel pairs 11 – 17, illustrating such a reallocation to the GMRS.

Proposed New 47 § 95.1763(g) & (h) - 35 – 44 MHz 300-Watt GMRS Allocation

Channel	Mobile Frequency (MHz)*	Base or Mobile Frequency (MHz)
11	35.260	43.260
12	35.300	43.300
13-A**	35.340	43.340
13-B***	35.540	43.340
14	35.380	43.380
15	35.420	43.420
16	35.540	43.540
17	35.660	43.660

*These frequencies are for use only as repeater input frequencies

**The Channel 13-A pair is not authorized for use in the Virgin Islands.

***The Channel 13-B pair is only authorized for use in the Virgin Islands.

V.

CONCLUSION

This Petitioner has demonstrated that there is a need for the allocation of new 35 – 50 MHz frequencies to the GMRS and FRS. This Petition hereby proposes such a 35 – 50 MHz GMRS/FRS allocation using reallocated VHF Low Band channels, which include the 47 CFR Part 15 46/49 Low Power MHz Cordless Telephone & 49 MHz Low Power Walkie-Talkie/Baby Monitor frequencies and 47 CFR Part 22 VHF Low Band (PMRS) Paging Channels, to create the capability of average citizens to be able to communicate beyond “line-of-site” for both personal and emergency communications.

The Petitioner therefore requests that the Commission proceed forward with this Petition with the issuance of a Rule Making (RM) number allocation.

The Commission expedited issuance of a RM number allocation for this PETITION FOR RULE MAKING is in the public interest.

Respectfully submitted,

jack ramberg

**Jack Ramberg – President
National Capitol Communications, LLC**

Michael C. Trahos

**Michael C. Trahos, DO, NCE, CET – FCC Liaison
National Capitol Communications, LLC**

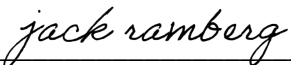
VI.

CERTIFICATE OF SERVICE

I, Jack Ramberg & Dr. Michael C. Trahos, do hereby certify that a copy of these REPLY COMMENTS and PETITION FOR RULE MAKING was sent by first class United States mail or electronic mail to the parties listed below, who provided contact information with their COMMENT submissions, on the day and date first above written.

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Respectfully,



Jack Ramberg – President
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Respectfully,



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