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Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Dear FCC,

As the Team Lead for Community Emergency Response Team (CERT), a.k.a. Neighborhood Emergency Team (NET), volunteers of the Hayhurst neighborhood in Southwest Raleigh Hills area of Portland Oregon, we'd greatly appreciate you clarification... but first, some context. Our volunteer group has been trained by local Portland Fire and Rescue staff along with formal certification provided by the Portland Bureau of Emergency Management (PBEM) to act as volunteers available for on-call assistance in an effort to help support the local fire and rescue services in the event of a large scale incident requiring public trained, coordinated assistance. The problem is that not all NET volunteers have Ham Amateur Radio Operator or GMRS licenses, thus for many years we've resorted to using low cost handheld FRS radios for communications. Due to this area being hilly, transmitting with FRS at 0.5 Watt held a limited distance, in turn requiring relaying at short distances, thus reducing the number of available volunteers and decreasing the teams' effectiveness.

As past commentators stated with section 51 and 52 within [FCC WT Docket No. 10-119](#), specifically, regarding following:

51. "In the shorter term, we concur with commenters who suggest that the best solution to the problem of GMRS/FRS combination radios already in operation is to reclassify existing GMRS/FRS combination radios which operate at power levels under two Watts ERP as FRS units for which no individual license is required, and GMRS/FRS radios that operate above that power level as GMRS, with the latter continuing to require an individual license.¹³⁶
52. In order to accommodate these existing lower power combination devices in the FRS, we are increasing the maximum authorized radiated power limit for FRS channels 1-7 from 0.5Watts to two Watts, and making the GMRS 462MHz main channels available to the FRS for use on a shared basis with GMRS. The new channels will be numbered FRS channels 15 through 22, and the FRS power limit for these channels will be two Watts ERP. In addition, we redesignate FRS channels 8 through 14 (the interstitial channels between the GMRS 467 MHz channels, which formerly were designated exclusively for FRS) to GMRS for use on a shared basis with FRS. They will be available to GMRS operators under the same technical limits that currently apply to FRS.¹³⁷ We retain the five Watts ERP limit for GMRS operation on the 462MHz interstitial channels.¹³⁸ Consequently, all FRS frequencies will now be shared with GMRS, while the eight GMRS 467 MHz main channels (repeater input channels) will remain exclusively GMRS."

Do the above highlights allow simplex transmission via FRS/GMRS ("bubble-wrapped") two Watt max handheld radios on channels 1 thru 22 without a family GMRS license? If not, we'd like our comments be raised for further consideration to help CERT efforts within the United States of America better able to communicate and assist with first response during emergency operations conditions. We feel that doing such would provide a much more suitable solution to help better equip the USA CERT volunteers to enable them to work more effectively and collaboratively in times of desperate need.

Sincerely,



Gregory Zupan

Reply to letter:

From: [IT Service Desk](#)
Sent: Friday, October 6, 2017 1:12 PM
To: firstresponders@hayhurstnet.com
Subject: ULS Help Case HD0000355963 Resolution

The information you requested from the FCC can be found below in the body of the email.

If you have any questions contact us at

(877) 480-3201.

Thank You!

Case Id: HD0000355963

Summary: Rule Clarification

Description: I called into FCC Wireless Communications and asked if FRS/GMRS radios transmitting at or under 2 watts does NOT require a GMRS license. The support rep stated as noted in section 51 and 52 within FCC WT Docket No. 10-119, a license is no longer required for under 2watt transmission. She recommended to receive a written confirmation, submit online, for secondary written confirmation from FCC. Please see the attachment for further details if this summary is unclear. We just want email confirmation. Thank you.

****Please do not reply back to this message. The e-mail address is configured for outgoing e-mail only.****

Dear Mr. Zupan,

Per Docket No. 10-119, Dual Band (GMRS/FRS) radios under 2 watts will no longer require licensing (radios with dual frequencies may continue to be sold during a two-year transition period).

If you have any further questions, or need additional information, please submit a help request at <https://www.fcc.gov/wireless/available-support-services> or call the FCC Licensing Support Center at (877) 480-3201.

Sincerely,

FCC Licensing Support Center
8:00 AM – 6:00 PM EST, M - F

Ref:MSG0707034