

To the Commission:

Having only just read the outcome of ET Docket #12-338, these informal comments are of a preliminary nature only, and will later be supplemented by formal comments as appropriate in these proceedings. These informal comments are entirely on the subject of the 2200 meter Amateur Radio allocation, and the rules and regulations to be developed which allow Amateur Radio licensees to operate in this spectrum while acting as good stewards of this radiofrequency resource.

First, thank you. This thank you is to the FCC. Truthfully, I wasn't sure Amateur Radio would get an allocation at 2200 meters, so for giving us a chance, thank you.

Second, to my fellow hams: please be conciliatory to the electrical power companies in whatever suggestions you put forward. Right now, I doubt they agree with me that we need each other, but we need the electric utilities and they need us. Were it possible, I'd write into the implementing regulations requirements that, once an Amateur Radio licensee secured his/her rights to any discovery, invention, or idea in the 2200 meter band, the electric utilities would have the option to license (non-exclusively) that intellectual property. As it stands, I just want us to be friends and work together in all things regarding this band. We have much more in common now than before, and it's important we work together.

To these ends, I strongly advise that Amateur Radio enter in the 2200 meter band on a phased basis, with Amateur Extra Class operators being first to use the band, then Advanced Class, then General. This is to ensure the qualifying test pool questions for the 2200 meter band can be developed and published for these license classes. Those who held an Experimental Radio Station License in the 2200 meter band prior to the docket date of these proceedings can be 'grandfathered' into the rule to allow continued use of the band. I suggest this gradual entry into the band over a five to ten year period. I would also reiterate my belief stated in ET Docket #12-338 that only Amateur Extras operate with the full legal limit of power output on the 2200 meter band, with all other operator classes operating at -10 dB below that.

Finally, if it gives the electric utilities some measure of comfort, I'm perfectly happy to allow UTC to act as a database and coordinator, to a degree that can be determined later, for fixed station operation in the 2200 meter band.

Again, I am extremely grateful to the Commission...we will keep the faith with you on this allocation. To our friends in the electric power industry, we want to work with you and share our efforts with you...please give us a chance: I doubt we'll disappoint you.

Very respectfully yours,

/s./ James Edwin Whedbee