

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

**In the Matter of** )  
 )  
**Amendment of Parts 2, 15, 80, 90, 97 and 101 of** ) **ET Docket No. 15-99**  
**the Commission’s Rules Regarding Implementation** )  
**of the Final Acts of the World Radiocommunication** )  
**Conference (Geneva, 2012) (WRC-12), Other** )  
**Allocation Issues, and Related Rule Updates** )

**Reply to Comments by Michael L. Peak, WZ5Q, to previous comments regarding Radio Buoys  
in the 1900-2000 kHz Band**

**To: The Commission**

I am an Extra class amateur radio operator and actively use the 1800-2000 kHz band as a licensed operator. I was very pleased with the Commission’s recent decision to reallocate the 1900-2000 kHz segment of this band to the amateur service on a primary basis under ET Docket No. 12-338.

I do not agree with the pending proposal to permanently authorize heretofore illegal radio buoys located in the “open sea” to operate in the 1900-2000 kHz segment.

I concur with the comments made by Brian S. McDaniel and by the American Radio Relay League, that the distinction between “open sea” and “inland waters” is ambiguous.

I also concur with these commenters that despite proposed power limitations, given the large number of existing and potential new beacons and the coverage area expected of a transmitter located over salt water, harmful interference to land-based amateur radio operation, already being reported at present, will substantially increase in the future if these beacons are made legal.

I would also agree with Donald Chester’s comments that Radio buoys would suffer far less interference operating in the now-vacant 1715-1800 kHz Radiolocation spectrum, than in the heavily used 1900-2000 kHz amateur band.

In conclusion, I therefore concur with Mr McDaniel and the American Radio Relay League that any new radio buoys should be transitioned to another MF band. I would further suggest that the entire 1715-1800 segment be considered for this re-accommodation, not just 1750-1800 kHz. I also concur with the ARRL that a sunset date for 1900-2000 kHz buoys should be established for those currently deployed.

Respectfully submitted for your consideration,

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