



Federal Communications Commission
Enforcement Bureau
Region One

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March 25, 2026

**BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED,
FIRST CLASS MAIL AND UPS**

David O. Knudtson
125 North Balph Avenue
Pittsburgh, PA 15202

**NOTICE OF UNLICENSED OPERATION AND
NOTIFICATION OF HARMFUL INTERFERENCE**

Case Number: EB-FIELDNER-25-00039052

The Federal Communications Commission (FCC or Commission) received a complaint from Allegheny County Pennsylvania Emergency Services (Allegheny County) concerning interference to its 911 emergency communications channel operating on 470.4375 MHz in Pittsburgh, Pennsylvania. On July 30, 2025, Agents from the Columbia Office of the FCC's Enforcement Bureau (Agents) conducted an investigation and determined, using direction finding techniques, that the source of the interference to the Allegheny County system was a signal emanating from the residence of David O. Knudtson (Knudtson), licensee of amateur radio station KD3ASC. After the Agents notified Knudtson of the interference issue, he produced a handheld radio (identified as a BTech UV-Pro). An examination of the radio determined that it had been modified to monitor the Allegheny County channel, and its "Audio Relay" feature had been activated. This feature turned Knudtson's radio into a simplex repeater that was retransmitting the Allegheny County channel. Knudtson surrendered the radio to the Agents. Subsequently, the Agents verified that the interference to the Allegheny County system had ceased.

Radio stations, including those operating on 470.4375 MHz, must be licensed by the FCC pursuant to the Communications Act of 1934, as amended (Act) and Section 1.903(a) of the Commission's rules (Rules).¹ The only exception to this licensing requirement is for certain transmitters using or operating at a power level or mode of operation that complies with the standards established in part 15 of the Rules.² Non-licensed operation pursuant to part 15 of the Rules, however, is conditioned upon compliance with all applicable regulations in the subpart.³ All intentional radiators operating pursuant to part 15 of the FCC's Rules must be certified for use as a part 15 device.⁴ and failure to operate such device consistent with its authorization violates part 15 of the Rules.

¹ 47 U.S.C. § 301; 47 CFR § 1.903(a).

² 47 CFR §§ 15.1, *et seq.*

³ 47 CFR § 15.1(b).

⁴ 47 CFR § 15.201(b).

Section 97.301(a) of the Rules lists the frequency bands that are available for an amateur radio operator like Knudtson who holds a Technician class amateur radio license.⁵ The investigation determined that Knudtson transmitted on a frequency outside of these bands. Specifically, on July 30, 2025, Knudtson operated on 470.4375 MHz, and therefore, he operated without the required authorization⁶ for that frequency in violation of section 301 of the Act,⁷ and sections 97.301(a) and 1.903(a) of the Rules.⁸

Finally, section 333 of the Act states that “[n]o person shall willfully or maliciously interfere with or cause interference to any radio communications of any station licensed or authorized by or under this chapter or operated by the United States Government”⁹ and section 97.101(d) of the Rules states that “[n]o amateur operator shall willfully or maliciously interfere with or cause interference to any radio communication or signal.”¹⁰ Agents identified an amateur radio in Knudtson’s possession as the device transmitting on frequency 470.4375 MHz and causing harmful interference to Allegheny County’s licensed public safety radio communications system. Consequently, Knudtson’s operation of his device was in violation of section 333 of the Act and section 97.101(d) of the Rules.¹¹

You are hereby warned that operation of radio transmitting equipment without a valid radio station authorization and that causes harmful interference constitutes a violation of the Federal laws cited above and could subject the operator to severe penalties, including, but not limited to, substantial monetary fines, *in rem* arrest action against the offending radio equipment, and criminal sanctions including imprisonment.¹² Because unlicensed operation creates a danger of interference to important radio communications services and may subject the operator to severe penalties, this letter emphasizes the importance of complying strictly with these legal requirements.¹³

UNAUTHORIZED OPERATION OF THIS RADIO STATION AND ASSOCIATED HARMFUL INTERFERENCE MUST BE DISCONTINUED IMMEDIATELY AND MUST NOT RESUME.

You have ten (10) days from the date of this notice to respond describing the steps you are taking to avoid operating on unauthorized frequencies and preventing future interference. Your response should be sent

⁵ 47 CFR § 97.301(a).

⁶ Knudtson’s handheld radio was not certified for use as a part 15 device, thus it did not qualify for an exception to the Section 1.903(a) licensing requirement. Knudtson’s radio was certified as a part 90 device, rated for a power output far above part 15 power limits. *See* FCC Office of Engineering Technology, Grant of Equipment Authorization for the BTech UV-Pro, April 30, 2024 (on file in EB-FIELDNER-25-00039052).

⁷ 47 U.S.C. § 301.

⁸ 47 CFR §§ 1.903(a), 97.301(a). Section 97.103(a) of the Rules states that an amateur licensee “is responsible for the proper operation of the station in accordance with the Rules. 47 CFR § 97.103(a). Therefore, because Knudtson’s operation violated sections 97.301(a) and 1.903(a) of the Rules, he also violated section of 97.103(a) of the Rules.

⁹ 47 U.S.C. § 333

¹⁰ 47 CFR § 97.101(d).

¹¹ *Id.*

¹² *See* 47 U.S.C. § 401, 501, 503 and 510.

¹³ *See* 47 U.S.C. §§ 401, 501, 503 and 510.

to the address in the letterhead and reference the listed case number. Under the Privacy Act of 1974,¹⁴ we are informing you that the Commission's staff will use all relevant material information before it to determine what, if any, enforcement action is required to ensure your compliance with Rules. This will include any information that you disclose in your reply.

You may contact this office if you have any questions.

David Dombrowski
Regional Director, Region One
Enforcement Bureau

Enclosures
Excerpts from the Communications Act of 1934, As Amended

¹⁴ 5 U.S.C. § 552a(e)(3).