

**COMMENTS ON FCC OET 17-215
JANIS CARSON AB2RA**

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This comment is in response to OET 17-215 inquiry about obsolete rules. I wish to suggest deletion of an obsolete rule which would not cause any “commercial” use of amateur radio, but it would certainly make it more fun. In concert with my comments about Winlink elsewhere, this activity would not be any more “commercial” than what is currently being done there. It would also not detract from regular music broadcasting listeners, since almost no Americans own short wave receivers any more. In addition, the noise levels of incidental radiators like lights and switching power supplies are so loud that reception of even AM broadcasting is difficult. Many people receive their music programming from the Internet on a smartphone these days.

If you are looking for entertainment on Shortwave, you really should tune in 7.2 MHz at any time of the day. Its like the Jerry Springer show on steroids, non stop! The language is not even bleeped out. I leave a radio tuned to this when I am in my workshop, and it is hilarious. Check it out!

Since all of the other filers are promoting their wish lists, here is mine:

Delete obsolete FCC Part 97 rule

§97.113 Prohibited transmissions.

(a) No amateur station shall transmit:

- (4) Music using a phone emission except as specifically provided elsewhere in this section;**

Replace it with:

(4)Any FM or full carrier double sideband AM may transmit music for not more than 39 seconds (to honor copyright rules) during its station ID or directly prior to it as a voiceover or bumper music. These transmissions must comply with routine station ID rules elsewhere, and not be more often than 9 minutes.

W1AW gets to broadcast and we do not, due to technical wording. Why not the rest of us. Except this is not broadcasting, it would only be allowed during and actual 2 way contact with another ham.

PLEASE let's don't do this 17-215 thing again, any time soon. It is exhausting.

Sincerely submitted,

/S/

Janis Carson, AB2RA, licensed since 1959, Extra Class, ARRL member for over 40 years.