

My name is Anne Fanelli. My callsign is WI2G, and I have been licensed since 1986. Although I have seen many changes to Part 97, the ARRL PETITION FCC ID 1022823795806 would cause incalculable harm to the amateur bands and I urge the Commission in the strongest possible terms to REJECT RM-11828, RM-11708, RM-11759 and 16-239.

RM-11828 provides no proof that it would increase participation in amateur radio or promote license upgrades, since the ARRL's survey "methodology" is seriously flawed. With an historic membership of about 20% of the amateur population, it has no right to claim that it speaks for all amateurs. During the past quarter-century, the ARRL has relentlessly promoted data operation for corporate reasons (to sell advertising in its magazine, *QST*) and increasingly ignored its core constituency: Morse-code (CW) and voice operators, who continue to provide the lion's share of emergency communications.

Past changes to the 80-meter band plan, proposed by the ARRL and approved by the Commission, have made Morse operation increasingly difficult. Morse code remains a popular mode worldwide and in the United States, and is the only mode which is unique to amateur radio. So-called "narrowband" digital modes, permitted with CW on 80 meters, are anything but; these multi-tone modes are broad-spectrum, and incompatible with CW. There is widespread non-compliance with the current, long-standing rule to listen before transmitting—despite the ARRL's ridiculous claim that it regulates the amateur bands with volunteers—and the narrowest CW receiver filter is useless against a multi-tone signal.

The ARRL proposals would allow a Technician-class licensee, with minimal expertise and a license which can be acquired over a weekend, to be the control operator of a station whose improper operation could cause world-wide interference. This would undoubtedly attract the attention of the United Nations' International Telecommunication Union. The ARRL's claim that increasing Technician-class privileges would somehow promote STEM is the cynical use of a popular concept to support the corporation's bottom line: a slightly-increased market (since most amateurs, even new licensees, don't join the ARRL or receive *QST*) for the products it advertises. I trust that the Commission will heed the wishes of the large majority of licensed amateurs, and not those of a corporation which has become a lobby for other commercial interests.