Revising and extending my Comment timely filed in the Public Record in **Opposition** to RM-11828.

The voice mode of **Amplitude Modulation** (**AM**) should be included in any discussion of privileges that may help lure prospective candidates to Amateur Radio.

There are fundamental flaws that doom RM-11828, but as a secondary issue, the proposal from the leisure-time association ARRL also fails to include the signal type of **AM** in its premise that “Technician Class” licensees need voice privileges on our shortwave allocations to encourage them to remain in the hobby.

Petitioner has asked the FCC to grant a specialized voice privilege type known as **R3E** to this class of license. The type is defined as single sideband with reduced or variable carrier, a type of voice communications that can be difficult for newcomers to understand, and challenging to explore as a technical function of well-adjusted radio communications.

R3E is not a normal type of “radio” that people from outside the hobby would use to talk with one another. When received on ordinary, consumer-oriented radios, R3E’s missing or inadequate signal makes it sound unintelligible compared with cellular telephone voice communications that a user would be more familiar with hearing. R3E also compares poorly with home television audio and even the audio from computer-based communications such as Skype. R3E is not permitted on the popular Family Radio Service which uses the clear and stable voice type known as Frequency Modulation.

The ARRL group does not explain in its proposal why it would not include the more familiar voice privilege type known as **A3E, Amplitude Modulation.** This mode is the wholesome and familiar signal people hear on car radios. This popular mode enjoys longstanding acceptance in the hobby as well, and is a prime attraction when its use is demonstrated at hobbyist gatherings known as “hamfests.” It would hold substantial allure as a social icebreaker with newcomers, encouraging mentoring conversations thanks to a relaxed and inviting sound that is unavailable on R3E.

Not including AM in its proposal is all the more puzzling knowing that the ARRL, in the past year’s time, has inaugurated the use of AM from its flagship station, W1AW in Newington, Connecticut. The group obtained a retired AM broadcast transmitter from a museum in Maryland, and its technicians repaired, restored, and re-tuned it to the hobby’s shortwave frequencies with the support of Part 97. ARRL also acquired in that time frame a contemporary, purpose-built AM transmitter called the “Super Senior,” which is in use on hobbyist frequencies through 7.295 MHz shortwave.

Many people over the years have pursued and earned licenses in the Amateur Service thanks to their having monitored stations whose operators prefer using **AM**. These encounters take place via internet-based, streaming audio receiver sites such as websdr.org and globaltuners.com, as well as via traditional reception using inexpensive shortwave receivers such as the Sangean and Grundig products available for $100 or less.

CONCLUSION

Re-stating this Commenter’s Opposition to RM-11828, the ARRL’s Petition should be withdrawn by the group or rejected by the Commission because it does not assess what outsiders would identify as motivation to become licensed and then remain with the hobby after they’ve passed any of the three testing levels available.

As the group’s Petition now sits, the permanent handover of upper-class license privileges after lower-level testing is not documented as a successful way to recruit newcomers.

Kindly consider these additional remarks endorsing consideration of wholesome **AM** among voice communications for any future, *viable* proceedings that seek to attract outsiders to the hobby and retain their interest for years that follow.

Signed

/-S-/

Paul S. Courson

WA3VJB

Advanced Class licensee