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Comments in the Matter of )  
)  
Amendment of Part 97 of the Commission's ) WT Docket No. 16-239  
Amateur Radio Service Rules to Permit Greater )  
Flexibility in Data Communications ) RM-11708

## **COMMENTS ON PROPOSED RULEMAKING**

### **INTRODUCTION**

I am a licensed amateur radio operator W8HDU. I am an active user of digital modes, some of which apply in this proposed rule making. I'm also an avid experimenter, designer, and employed as a broadcast Chief Engineer of 4 affiliate network DTV television stations, and Director of Engineering for a television broadcast group.

### **COMMENTS**

I agree with the Commission that a rule change will allow amateur service licensees to use modern digital emissions, thereby better fulfilling the purposes of the amateur service, enhancing its usefulness, and contributing to technical advancements in our nation.

Several of the commenter's have stated this rule change will allow amateur service licensees to use modern digital emissions, thereby better fulfilling the purposes of the amateur service and enhancing its usefulness. This statement is correct. Many technologies of today were born from the testing, experimentation, and perfection of ideas of yesterday.

One commenter notes; "[t]he rest of the amateur radio operators in the world do not have this restrictive symbol rate requirement that is in the current Part 97"<sup>1</sup> If we exclude ourselves from the technology standards of other nations we limit ourselves to future possibilities technology has to offer. We, (amateurs), need to be equal with the rest of the world in respect to technical specifications if we are to lead in changing new technologies.

I support the 2.8 kilohertz bandwidth limitation. While advancing technology and pushing the envelope; we must be conscience of other modes/services/individuals impacted by wider bandwidths.

I encourage the FCC and ARRL to widely publish a band plan of emission types & max data rates within amateur spectrum.<sup>2</sup> Since there are so many types of modulation it is often confusing to new users to know all the various modulation formats. A published "band plan" would be valuable to quell the potential for interference, as well as interest new experimenters and provide a guide to for users.

I applaud the Federal Communication Commission on advancing technology in this matter.

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<sup>1</sup> David J. Struebel Comments.

<sup>2</sup> See Reorganization and Deregulation of Part 97 of the Rules Governing the Amateur Radio Services, *Notice of Proposed Rule Making*, PR Docket No. 88-139, 3 FCC Rcd 2076, 2078 ¶ 19 (1988).