

Eliminating the baud rate without a corresponding bandwidth limit will increase congestion in the RTTY/Data sub bands. The modes being proposed, MIL-STD, Pactor 4, etc as designed operate on fixed channels with no requirement to share spectrum in their non ham incarnations. The congestion exists today with Pactor 3 and some other digital messaging modes failing to abide by current rules regarding interference and signal quality. These stations can not be easily identified in most cases and the content of the transmission can not be decoded by third parties, this in a service intended to be open for all to see. Some commenters point out the rest of the world has no baud restrictions but fail to mention they have bandwidth limits and narrow modes are protected from wide modes. See the IARU suggested band plan for Region 2 at <http://www.iaru.org/region-2.html> Neither this proceeding nor the original ARRL request address the interference potential of the proposed changes. Current rules seem to be widely ignored, offer no protection from the ongoing problems we have with certain data modes and I expect any new wide band rules will suffer the same fate without meaningful monitoring and enforcement.

The NPRM requests input on cost versus benefit and recognizes that elimination of the baud rate limit is “likely to increase congestion”. Since hams are supposed to be largely self policing the added cost of hardware or software to decode the proposed wide modes would pose an undue burden on hams not interested in operating those modes but are affected by interference from them. In the case of Pactor 4 an SCS modem will cost in excess of \$1800 and even with this modem the content of the transmission can’t be read. The only benefits commenters in the original RM point to is faster email transfer, a very few amateur operators primarily marine and emergency users could possibly benefit from the increased speed. Emergency communications, while an important function of amateur radio, usually do not need HF due to most events being localized and rare. There is a lot of experimenting on the VHF+ bands with wider, faster data modes where this activity has available band width to minimize impact on other users and is used to support emergency communications.

Commission states current rules are sufficient to prevent inefficient use or other abuse of the system. Rules without enforcement are not effective and we have problems now with certain digital modes ignoring the same rules cited to prevent interference and other abuse of the service. The large number of comments in the original RM about current problems demonstrate existing rules aren’t working as intended. It’s not working now so how does passing this NPRM improve things? The current conditions should be addressed before unleashing anything new with the potential to do greater harm. As a possible solution for today’s problems consider N9NB’s suggestions to the original RM <https://ecfsapi.fcc.gov/file/60001039571.pdf>

Today’s amateur is not prevented from “stepping beyond today’s radio science” There is a wealth of spectrum above HF that provides ample space and opportunity to experiment with new innovations. It’s an ideal place to develop new systems with minimal impact and if a mode proves to be useful on HF an STA can be applied for before full authorization on the crowded HF bands.

If we must have no baud limit on the MF/HF bands we should have band width limits more in line with the rest of the world. Adopting the IARU Region 2 band plan with adjustments for license class would better align US usage with the rest of the world and reduce the possibility of conflicts beyond domestic borders. Another option would be re-designate the current bands as wide and narrow segments instead of the outdated RTTY/Data, Voice/Image, set the bandwidth limits to 400Hz narrow and 2.7kHz wide and leave the automatic sub bands as is, any mode allowed as long as it fits the bandwidth of the segment. No wide band data on 30m, 17m or 12m as they are too narrow already without adding more congestion. The payload for a digital signal should not matter only the bandwidth used, Once something, voice, text or image, is digitized it is still sent as audio in one form or another.

If this proceeding passes as is it should include a sunset clause to evaluate the impact at some reasonable future date. There should be some recourse if it fails beyond filing a new petition.

Thank you for the opportunity to comment

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