RM-11708 Comments

TO: Federal Communications Commission

RE: RM-11708

I have been involved both personally and professionally in communications technology for more than 40 years, and cannot believe the significant deviation from policy suggested by this rule-making issue. Amateur radio communications has always been viewed as an open service with public service at its core. The use of un-encrypted emissions and the non-commercial use of the spectrum has been the cornerstone of its use since the very beginning. Sharing of limited spectrum has always meant reducing one's emissions to the smallest bandwidth necessary to support the intended amateur use of this resource. RM-11708 represents a major change to these tenets, opening the door for private encrypted data communications that potentially will use significant amounts of bandwidth unless controlled by the rules.

It is for these reasons that I am opposed to the FCC proposal to allow unrestricted wide-bandwidth data communications in the amateur radio HF allocations. Such a proposal would cause significant harmful interference to existing narrow-band communications such as CW, Radio-Teletype (RTTY), and other narrow band-width data communications such as PSK-31, JT-65, JT-9, etc., many of which are purposely designed for weak-signal use. Further, the Commission should not allow proprietary data communications (such as Pactor-4) within the amateur bands which cannot be decoded by publicly available open-source software. The reason for this is that the amateur radio has always been self-policing in addition to the spectrum monitoring that the FCC performs itself.

Unrestricted wide-bandwidth data communications cannot co-exist with the traditional narrow band-width modes mentioned above. Further, due to spectrum crowding, the amateur community has traditionally experimented with many varieties of narrow-band data communications. Thus the proposal to allow unrestricted band-width (symbol rate) data communications is completely counter to the general amateur radio concept to reduce spectrum congestion. Further, proprietary communication modes discourage experimentation.

If the Commission feels that it absolutely needs to allow unlimited band-width data communications within the amateur bands, then this in itself should be considered to be an experiment and placed in a spectrum segment away from and separate from the traditional band segments where CW and other narrow bandwidth data communications take place today. Thus the Commission is urged to limit symbol rates of data communications to those transmissions that do not exceed 400 Hz and for a spectrum that covers at least 125 kHz of each amateur band.

Thank you in advance for recognizing that the valuable resources of Morse Code (CW), Radio-Teletype (RTTY) and other narrow band-width amateur radio modes cannot co-exist with the proposed unlimited bandwidth data communications.

Sincerely,

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