

What follows are my comments regarding Part 97 Amateur Radio Subpart D, Technical Standards in regards to ET Docket No. 17-215 (Advisory Council Investigating Technical Regulations).

I feel there are significant number of outdated rules that are, and have been for quite some time been hindering Radio Amateurs capability to experiment and innovate. I feel the existing regulatory framework will not keep up with development, and needs more than the traditional piecemeal approach where one rule is changed at a time. As long as ham radio continues to have a list of permitted emission designators, our regulations remain brittle and prone to rapid obsolescence. Even the ARRL seems to feel the status quo is no longer adequate, as evident by comments in their July 2017 board meeting.

While the league hasn't yet announced their vision of the future and conveyed it to their membership, it undoubtedly has to do with digital modes, and their potential. The problem with the rules currently is as every year passes the definitions of emission types/modes become increasingly more blurry, and unnecessarily restrictive. Just because the primary use of say D-Star is voice traffic, does not in my mind classify it as phone/voice instead of RTTY/data. The reality is that a single digital transmission should be expected to carry many modes.

A classic example that I have commented to the Commission as well as the ARRL deals with the permitted bandwidth on data versus image on the 70 centimeter band. I feel it is unfair and is holding up developments as well as potential band uses. Nearly 15 years ago an ARRL Technology Task Force survey revealed that the number one interest in new technologies was in high-speed digital networks, sadly the regulations and framework are the primary hold up.

If purpose of this FCC comment period is to modernize and streamline some of the rules to increase efficiency and decrease regulatory burden, then I would have to recommend the Commission re-review a response to RM-11625 written by Bruce Perens in December 2012. In his 25 page response to allowing TDMA, he details an ambitious project, Codec2. More importantly he dives into explaining why the existing regulatory framework is not well formed for software defined radio and the future. He also carves out a choice of three proposed sets of regulatory changes.

In addition, Bruce points out that Radio Amateurs have a proven track record of being able to self regulate. The concept of shifting to a more generic, less restrictive regulatory rule framework works in other countries, and I would expect it to be beneficial to both the Commission and Radio Amateurs here in the US.

I would urge the Commission to implement something sooner than later as will only help lighten their own administrative load, instead of continuing the drawn out piecemeal approach of having to approve new modulation types.

Thank You  
Steve Lampereur