

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC, 20554

In the Matter of: Notice of Proposed Rulemaking WT Docket 16-239, NPRM-11708
and the associated RM-11708, RM 11759, RM-11769

Amending Part 97 of the Commission's
Rules and Regulations to Permit Greater Flexibility in Data
Communications

To the commission:

ADDENDUM TO EARLIER NPRM-11708 FILING WITH ADDITIONAL SUGGESTED PART 97 TABLES
TO IMPLEMENT MODIFIED WT 16-239 NPRM-11708 PREVIOUSLY DESCRIBED BY ME, JANIS
CARSON, AB2RA, LICENSED SINCE 1959, EXTRA CLASS, ARRL MEMBER 40 YEARS

FCC PROPOSES TO ELIMINATE THE OBSOLETE BAUD RATE LIMIT; I AGREE THAT THIS INDIRECT
MEANS OF REGULATING BANDWIDTH IS OBSOLETE. I AGREE THAT AN ARRL ARBITRARY 2.8 KHZ
LIMIT WOULD AGAIN ONLY BE PLANNED OBSOLESCENCE, AND ONLY RESULT IN FURTHER FCC TIME
AND RULEMAKING "COSTS" LATER AS NEW MODES EVOLVE. BUT WITHOUT A NEW BAND PLAN,
"UNDESIRABLE CONGESTION" AND CONFLICT BETWEEN "INCOMPATIBLE EMISSION MODES" WILL
INEVITABLY RESULT.

THERE HAS TO BE SOME LIMITS ON WHERE THIS NEW WIDE BAND DATA CAN BE LOCATED. THE
FCC "COSTS" SPENT ON 14.313 MHZ AND GLEN BAXTER KIMAN ENFORCEMENT WILL SEEM MINIMAL
BY COMPARISON IF THIS DETAIL IS NOT ADDRESSED. MANY COMMENTERS HAVE SUGGESTED 100
KHZ AT THE LOW END OF THE MAJOR HF BAND ASSIGNMENTS FOR CW/DATA NARROW MODES, WITH
AN ADJOINING WIDE DATA SEGMENT SLIGHTLY HIGHER IN FREQUENCY. I ALSO AGREE IN
PRINCIPLE WITH THAT, AND HAVE INCLUDED GRAPHICS OF BAND PLANS TO ACCOMPLISH THAT
"MITIGATION", WHICH ARE MOSTLY IN AGREEMENT WITH ARRL ORIGINAL RM-11708 AND RM-
11759 FILINGS AND INTENT, AND SHOW HOW TO ACCOMPLISH APPROXIMATELY WHAT THEY ARE
REQUESTING. THIS WOULD NOT ARBITRARILY LEAVE BAND SEGMENT CHOICE AND REGULATION UP
TO A PRIVATE ORGANIZATION, THE ARRL, BUT WOULD PUT IT IN THE HANDS OF THE FCC,
WHERE IT BELONGS. BUT SINCE IT IS THE CURRENTLY PROPOSED ARRL BAND PLAN, THEY
SHOULD AGREE ON ADOPTING IT INTO PART 97 RULES. THIS PROTECTS THE BAND ASSIGNMENTS
FROM THE "ARBITRARY AND CAPRICIOUS" CHANGES POSSIBLE FROM A PRIVATE ORGANIZATION
WITHOUT "DUE PROCESS AND PROPER PUBLIC INPUT". MANY COMMENTERS HAVE NOTED THAT ARRL
REPRESENTS LESS THAN 20% OF US AMATEUR RADIO OPERATORS BY MEMBERSHIP, AND
CONSIDERABLY LESS THAN THAT, IF THE REFERENCED HF BAND PLAN SURVEY IS TAKEN INTO
ACCOUNT. I DO NOT PLAN TO BELABOR THAT HERE. WE WANT SOLUTIONS THAT WORK.

THIS FILING IS AN ADDENDUM TO MY PREVIOUS FILING, WHICH DREW THREE FILINGS TOGETHER
INTO ONE PACKAGE THE FCC COULD RULE ON IN ONE ACTION, TO SAVE TIME. MY PREVIOUS
FILING WAS:

<https://ecfsapi.fcc.gov/file/109011952607702/FCC%20FILING%20docket%2016%20239%20FINAL10%20%20rm11708.pdf>

IT INCLUDED BAND PLAN GRAPHICS FOR EACH HF AMATEUR BAND, AND SOME SUGGESTED PART 97
WORDING. THE PART 97 WORDING IN THE APPENDIX AT THE END WAS INCOMPLETE. I PRESENT
IT HERE IN THE FOLLOWING PAGES, IN A FORMAT THE FCC MIGHT FIND HELPFUL TO IMPLEMENT
THE "MITIGATIONS" I BELIEVE WILL BRING THE CONFLICTED PARTIES TOGETHER AND SET THE
MATTER TO REST. ARRL SHOULD BE DELIGHTED, BECAUSE THE BAND SEGMENTS I PROPOSE FOR
ACDS AND WIDE BAND MODES ARE SIGNIFICANTLY LARGER THAN WHAT THEY PROPOSED IN THEIR
HF BAND PLAN PROPOSAL PUBLISHED IN QST APRIL 2015. FCC GETS "NO BAND WIDTH LIMIT".

CW/NARROW DATA GETS PROTECTION. VERY MINIMAL IMPACT ON EXTRA VOICE PRIVILEGES. THIS FILING ALSO SPEAKS TO THE CORE ISSUE, NOT DIRECTLY OF BAND WIDTH, BUT THE NEED FOR FREQUENCIES ASSIGNED TO SEPARATE INCOMPATIBLE "ROBOT" AND "HUMAN" OPERATORS, REFERRED TO IN FCC DOCUMENTS AS "ACDS" AND "AUTO RESPONDING STATIONS", WHICH ARE THE PRIMARY USERS OF WIDER BAND WIDTH DIGITAL EMISSIONS. WITHOUT THESE SEPARATE FREQUENCY ASSIGNMENTS FOR CW/NARROW DATA FOR THE ROUGHLY BOTTOM 100 KHZ AND A SEPARATE AREA FOR THE NEW WIDE BAND AND "ACDS/AUTO RESPONDING" OR "ROBOTS" AS TERMED HEREIN (REDUCES CONFUSION), "INTOLERABLE CONGESTION" WILL (AND HAS ALREADY) RESULTED. THIS FILING IS A CERTAIN SOLUTION "TO MITIGATE THOSE COSTS AND CONCERNS, WITHOUT LOSING THE BENEFITS OF THE PROPOSED INITIATIVE".

WIDE BAND DATA WITHOUT ANY RESTRICTION, AS FCC PROPOSED, WOULD BE FREE TO PURSUE ITS DESTINY IN ITS OWN BAND SEGMENT. THOSE ARRANGEMENTS OF SEPARATION ARE A KEY INGREDIENT OF IARU REGION 1, 2, AND 3 HF BAND PLANS, AS WELL AS THE HF BAND PLAN FOR JAPAN, WHICH IS NOT A "RECOMMENDED VOLUNTARY" BAND PLAN, BUT ACTUAL LAW. THESE ARE THE "GROUNDS" FOR ADOPTING INTO PART 97 REGULATIONS SOMETHING SIMILAR TO THE IARU AND JAPAN BAND PLANS, AS WIDELY ACCEPTED "GENERALLY APPLICABLE STANDARDS". **FAILING TO ADOPT INTO PART 97 RULES A BAND PLAN FOR MODERN TIMES WILL RESULT IN FAILURE OF THE FCC INITIATIVE TO MODERNIZE THE AMATEUR SERVICE BY INCLUDING MODERN DIGITAL EMISSIONS AND APPLICATIONS.**

THIS TIME IS NOT LIKE PREVIOUS PERIODS OF CHANGE IN AMATEUR PRACTICE. THE TRANSITION FROM SPARK TO CW EMISSION WAS A CHANGE FROM WIDE BAND SIGNALS CAUSING CONGESTION TO BETTER NEW NARROW BAND SIGNALS, BASED ON VACUUM TUBE OSCILLATORS INSTEAD OF FORD SPARK COILS OR ROTARY SPARK GAP AND COILS. BUT INDIVIDUAL "HUMAN" OPERATORS WERE STILL COMMUNICATING WITH OTHER "HUMAN" OPERATORS BY A DIFFERENT MEANS, BUT WITH THE SAME GOAL. "ROBOTS" WERE NOT THE PROBLEM THEN.

SIMILARLY, THE TRANSITION FROM AM VOICE TO SSB VOICE WAS A PERIOD OF UPHEAVAL, BUT IT WAS AGAIN A MOVE FROM WIDER TO NARROWER EMISSIONS, WITH THE SAME "HUMAN" TO "HUMAN" INTERCHANGE. "ROBOTS" WERE NOT THE PROBLEM THEN EITHER.

TODAY, THERE ARE STILL CUTTING EDGE NARROW BAND DIGITAL EMISSIONS BEING INVENTED, IMPROVED, AND EMPLOYED AS WE SPEAK. SOME OF THESE HAVE BEEN INNOVATED BY THE SPACE PROGRAM OR OTHER DEVELOPERS; SOME HAVE BEEN INVENTED BY HAMS. **THEY ARE NO LESS WORTHY OF RECOGNITION FOR THEIR USEAGE OR ACCOMPLISHMENT SIMPLY BECAUSE THEY DO NOT DEMAND LARGE SWATHS OF THE LIMITED SPECTRUM LIKE THE PROPOSED WIDE BAND MODES ASK FOR. THESE MODES HAVE "HUMAN" USERS.**

THE PRIMARY USERS OF THE PROPOSED "NO BAND WIDTH LIMIT" EMISSIONS ARE NOT "HUMAN" TO "HUMAN" BUT **ONE OR MORE OF THE STATION ACTING "CONTROL OPERATORS" IS IN FACT A MACHINE OR "ROBOT"**. SOMETIMES THESE SYSTEMS DO NOT INTERACT CORRECTLY WITH "HUMANS" IN A PRODUCTIVE WAY. THE EXACT PURPOSE OF MY PROPOSAL IN THIS FILING IS TO PUT THE "SELF DRIVING CARS" SAFELY ON THEIR OWN SEPARATE HIGHWAYS, IN THE INTEREST OF PROTECTING US "HUMANS" AND "MITIGATING" "CONGESTION". IT IS SIMPLY "IN THE PUBLIC INTEREST" TO PROVIDE SEPARATE HIGHWAYS, AND FAILURE TO EXERCISE "DUE DILIGENCE" IN THIS MATTER CAN RESULT IN "LOSS OF PROPERTY AND LIFE". **FURTHERMORE, THE COMPLICATION OF INTERNET CONNECTION TO "THIRD PARTY" USERS WILL RESULT IN MORE "CONGESTION", EXACTLY AS THE WIDE BAND EMISSIONS ARE SPECIFICALLY INTENDED TO OPERATE, IN THEIR INHERENT DESIGN AND STATED PURPOSE AND ADVERTISING.**

WHEN "HUMAN" OPERATORS CAN NOT CORRECTLY IDENTIFY A "ROBOT" SIGNAL AS AN **EMERGENCY COMMUNICATION**, OR VICE VERSA, BAD THINGS CAN HAPPEN. THIS IS ONE OF THE REASONS I PROPOSE A CW ID (OR SOMETHING ELSE THAT REALLY WORKS) ON ALL EMISSION TYPES AS WELL AS SEPARATION OF THE MODES. IN THE HISTORICAL CASES CITED ABOVE, THERE WAS NO NEED FOR FCC TO ACT ON THE IDEA OF IDENTIFICATION OR SEPARATION OF STATIONS. ALL PARTIES USED TO INTERCOMMUNICATE ON AT LEAST A BASIC LEVEL. THIS EXPLAINS THE LEGAL BASIS FOR MY FILING, AND PROPOSAL FOR "MITIGATING THE CONSEQUENCES". HERE ARE THE NEW PART 97 FREQUENCY ASSIGNMENT TABLES:

(b) For a station having a control operator who has been granted an Amateur Extra Class operator license, who holds a CEPT radio amateur license, or who holds a Class 1 IARP license:

Wavelength band	ITU region 1	ITU region 2	ITU region 3	Sharing requirements <i>see</i> §97.303 (paragraph)	
MF	kHz	kHz	kHz		
160 m	1810-1850	1800-2000	1800-2000	(a)	
HF	MHz	MHz	MHz	MHz	
80 m	3.500-3.625	3.500-3.625	3.500-3.625	3.500-3.625	(a)
75 m	3.625-3.800	3.625-4.000	3.625-4.000	3.625-3.900	(a)
60 m		See §97.303(h)			(h)
40 m	7.000-7.200	7.000-7.300	7.000-7.300	7.000-7.200	(i)
30 m	10.100-10.150	10.100-10.150	10.100-10.150	10.100-10.150	(j)
20 m	14.000-14.350	14.000-14.350	14.000-14.350	14.000-14.350	
17 m	18.068-18.168	18.068-18.168	18.068-18.168	18.068-18.168	
15 m	21.000-21.450	21.000-21.450	21.000-21.450	21.000-21.450	
12 m	24.890-24.990	24.890-24.990	24.890-24.990	24.890-24.990	
10 m	28.000-29.700	28.000-29.700	28.000-29.700	28.000-29.700	

THIS SHOWS LOSS OF 25 KHZ OF 75 M VOICE TO EXTRA AS IN RM-11759.

(c) For a station having a control operator who has been granted an operator license of Advanced Class:

Wavelength band	ITU region 1	ITU region 2	ITU region 3	Sharing requirements <i>see</i> §97.303 (Paragraph)	
MF	kHz	kHz	kHz		
160 m	1810-1850	1800-2000	1800-2000	(a)	
HF	MHz	MHz	MHz	MHz	
80 m	3.525-3.625	3.525-3.625	3.525-3.625	3.525-3.625	(a)
75 m	3.700-3.800	3.700-4.000	3.700-4.000	3.700-3.900	(a)
60 m		See §97.303(h)			(h)
40 m	7.025-7.200	7.025-7.300	7.025-7.300	7.025-7.200	(i)
30 m	10.100-10.150	10.100-10.150	10.100-10.150	10.100-10.150	(j)
20 m	14.025-14.150	14.025-14.150	14.025-14.150	14.025-14.150	
Do	14.175-14.350	14.175-14.350	14.175-14.350	14.175-14.350	
17 m	18.068-18.168	18.068-18.168	18.068-18.168	18.068-18.168	
15 m	21.025-21.200	21.025-21.200	21.025-21.200	21.025-21.200	
Do	21.225-21.450	21.225-21.450	21.225-21.450	21.225-21.450	
12 m	24.890-24.990	24.890-24.990	24.890-24.990	24.890-24.990	
10 m	28.000-29.700	28.000-29.700	28.000-29.700	28.000-29.700	

THIS SHOWS 80m ADVANCED 25 KHZ INCREASE OF CW, NARROW DATA, & WIDE DATA.

(d) For a station having a control operator who has been granted an operator license of General Class:

Wavelength band	ITU region 1	ITU region 2	ITU region 3	Sharing requirements see §97.303 (paragraph)
MF	kHz	kHz	kHz	
160 m	1810-1850	1800-2000	1800-2000	(a)
HF	MHz	MHz	MHz	
80 m	3.525-3.625	3.525-3.625	3.525-3.625	(a)
75 m		3.800-4.000	3.800-3.900	(a)
60 m		See §97.303(h)		(h)
40 m	7.025-7.125	7.025-7.125	7.025-7.125	(i)
Do	7.175-7.200	7.175-7.300	7.175-7.200	(i)
30 m	10.100-10.150	10.100-10.150	10.100-10.150	(j)
20 m	14.025-14.150	14.025-14.150	14.025-14.150	
Do	14.225-14.350	14.225-14.350	14.225-14.350	
17 m	18.068-18.168	18.068-18.168	18.068-18.168	
15 m	21.025-21.200	21.025-21.200	21.025-21.200	
Do	21.275-21.450	21.275-21.450	21.275-21.450	
12 m	24.890-24.990	24.890-24.990	24.890-24.990	
10 m	28.000-29.700	28.000-29.700	28.000-29.700	

THIS SHOWS 80m GENERAL 25 KHZ INCREASE OF CW, NARROW DATA, AND WIDE DATA.

(e) For a station having a control operator who has been granted an operator license of Novice Class or Technician Class:

Wavelength band	ITU region 1	ITU region 2	ITU region 3	Sharing requirements see §97.303 (paragraph)
HF	MHz	MHz	MHz	
80 m	3.525-3.600	3.525-3.600	3.525-3.600	(a)
40 m	7.025-7.100	7.025-7.100	7.025-7.100	(i)
15 m	21.025-21.090	21.025-21.090	21.025-21.090	
10 m	28.0-28.5	28.0-28.5	28.0-28.5	
VHF	MHz	MHz	MHz	
1.25 m		222-225		(a)
UHF	MHz	MHz	MHz	
23 cm	1270-1295	1270-1295	1270-1295	(d), (o)

[75 FR 27201, May 14, 2010, as amended at 75 FR 78171, Dec. 15, 2010; 80 FR 38911, July 7, 2015]

THIS SHOWS NOVICE/TECH "CW ONLY" ON 80, 40, 15 UPDATED TO COMMENSURATE WITH GENERAL CW PRIVILEGES. SPECIFICALLY, NO NOVICE/TECH IN NEW "?" MODE SEGMENTS. NO CHANGE TO NOVICE/TECH 10 METER "CW ONLY" PORTION OR 10 METER VOICE EMISSIONS/PRIVILEGES OR VHF/UHF PRIVILEGES.

§97.305 Authorized emission types.

- (a) Except as specified elsewhere in this part, an amateur station may transmit a CW emission on any frequency authorized to the control operator.
- (b) A station may transmit a test emission on any frequency authorized to the control operator for brief periods for experimental purposes, except that no pulse modulation emission may be transmitted on any frequency where pulse is not specifically authorized and no SS modulation emission may be transmitted on any frequency where SS is not specifically authorized.
- (c) A station may transmit the following emission types on the frequencies indicated, as authorized to the control operator, subject to the standards specified in §97.307(f) of this part

PLEASE NOTE: SINCE FCC DOES NOT HAVE A 160 METER BAND PLAN, HERE IT IS:

Wavelength band	Frequencies	Emission types authorized	Standards see §97.307(f), paragraph:
MF:			
160 m	1.8-1.84	RTTY, data	(3).
160 m	1.84-1.998	VOICE, IMAGE	(1), (2).
160 m	1.998-1.999	W data, ACDS	?
160m	1.999-2.0	CW	Beacons per IARU R2 spec.

THIS PLAN IS EXACTLY THE IARU REGION 2 BAND PLAN. IT IS A "GENERALLY ACCEPTED STANDARD", AS DISCUSSED ELSEWHERE IN THIS DOCUMENT.

PLEASE NOTE THAT ACDS IS LOCATED AT THE TOP END OF THE BAND, AWAY FROM WHERE THE DESIRABLE DX WINDOWS FOR CW AND SSB ARE LOCATED. I PETITION AND COMMENT ON NPRM-11708 WT-16-239 THAT WE ADOPT THIS BAND PLAN, SUBJECT TO OUR USA EMISSION DEFINITIONS (SSB AND AM STAY AS WE HAVE THEM DEFINED IN OUR EMISSION SPEC AND DESIGNATOR TABLES IN PART 97). CLARIFICATION: ANY ACDS NARROW BAND OR "ROBOTS" ARE CONFINED TO 1998 - 1999 ONLY. NO "ROBOTS" ANYWHERE ELSE ON THIS BAND.

WHILE THERE IS NO SUBSTANTIAL ACDS OR WIDE BAND ACTIVITIES ON 160 METERS, THERE COULD BE, ANYWHERE ON THE BAND UNDER CURRENT RULES. INCORPORATING THIS BAND PLAN INTO OUR PART 97 LAW WOULD CONFORM TO "GENERALLY APPLICABLE STANDARDS". IF ONLY IN THE BEGINNING THE ACDS AND WIDE BAND SEGMENTS HAD BEEN LOCATED AT THE TOP OF THE OTHER USA AMATEUR BANDS, IT WOULD NOT HAVE COME TO LOCATE IN THE MOST DESIRABLE WEAK SIGNAL PORTION. BUT THAT IS TOO LATE TO FIX.

PLEASE LET US CORRECT THIS MISTAKE AT LEAST FOR 160 METERS RIGHT AWAY.

PLEASE ADOPT THE 160 METER BAND PLAN AS PART 97 RULES, TO MAKE IT ENFORCEABLE, TO SET ASIDE "WIDE DATA, ACDS" SEGMENTS IN ALL HF BANDS.

HERE ARE THE REST OF THE BAND PLANS, PER PART 97 EXISTING RULES WITH RECOMMENDED CHANGES SHOWN.

Wavelength band	HF Frequencies	Emission types authorized	Standards see §97.307(f), paragraph:
80 m	3.500-3.600 MHz	RTTY, N data	(3), (9).
80m	3.600-3625 MHz	W data, ACDS	?
75 m	3.625-4000 MHz	Phone, image	(1), (2).
60 m	5.332, 5.348, 5.3585, 5.373 and 5.405 MHz	Phone, RTTY, data	(14). special
40 m	7.000-7.070 MHz	RTTY, N data	(3), (9)
40m	7.070-7.100 MHz	RTTY, N data	(3), (9)
40 m	7.075-7.100 MHz	Phone, image	(1), (2), (9), (11)
40 m	7.100-7.125 MHz	W data, ACDS	?
40 m	7.125-7.300 MHz	Phone, image	(1), (2)
30 m	10.100-10.140 MHz	RTTY, N data	(3).
30m	10.140 – 10.150 MHz	W data, ACDS	?
20 m	14.00-14.095 MHz	RTTY, N data	(3).
20m	14.095-14.0099 MHz	W data, ACDS	? beacon exclusion
20m	14.10001-14.150 MHz	W data, ACDS	? beacon exclusion
20 m	14.15-14.35 MHz	Phone, image	(1), (2).
17 m	18.068-18.105 MHz	RTTY, N data	(3).
17m	18.105-18.110 MHz	W data, ACDS	?
17 m	18.105-18.168 MHz	Phone, image	(1), (2).
15 m	21.0-21.090 MHz	RTTY, data	(3), (9).
15m	21.090-21.200 MHz	W data, ACDS	?
15 m	21.20-21.45 MHz	Phone, image	(1), (2).
12 m	24.89-24.925 MHz	RTTY, data	(3).
12 m	24.925-24.930 MHz	W data, ACDS	?
12 m	24.93-24.99 MHz	Phone, image	(1), (2).
10 m	28.0-28.120 MHz	RTTY, data	(4).
10m	28.120-28.189 MHz	W data, ACDS	?
10m	28.189-28.3 MHz	RTTY, data	(1), (2).
10 m	28.3-28.5 MHz	Phone, image	(1), (2), (10).
10 m	28.5-29.0 MHz	Phone, image	(1), (2).
10 m	29.0-29.7 MHz	Phone, image	(2).

W data, ACDS and ?= FCC will have to come up with the exact wording for any kind of non-human on site uncontrolled apparatus emitting any kind of digital waveform, containing any kind of information, as long as the entire signal and its distortion products are contained in the specified segment. NO ACDS or auto responding ROBOTS outside this segment, regardless of bandwidth of emission.

NOTE 1: For new “W data ACDS” segments, a new emission designator will be required. Since the bandwidth, modulation type and content will not be specified. I suggest: “?” as a designator. This gives total freedom to experiment with anything, no band width limit or confining specifications. FCC will have to come up with the exact wording for any kind of non-human on site uncontrolled apparatus emitting any kind of digital or other waveform, containing any kind of information, as long as the entire signal and its distortion products are contained in the specified segment. **It is important that there is no funny legalese loophole here: we are all intelligent enough to know a “ROBOT” from a “HUMAN” operator. The wording needs to be fixed up to make that distinction exact, to end the quibbling over what HF frequencies are authorized for “ROBOTS”. NO ACDS or auto responding ROBOTS outside these segments, regardless of bandwidth of emission, ON SITE HUMANS at the controls ONLY.**

Possibly FCC needs to provide wording for radio contesters who remote control equipment they own or rent from “superstations” to separate them from “ROBOTS”.

NOTE 4: This new emission designator “?” embodies the new FCC policy of “no band width limitation” on data modes, allowing total freedom in design of new or existing digital emissions within the designated segment. It saves enforcement “costs” because there is no specification to enforce. We can assume that the technology to “mitigate congestion” inside its segment will be trivial to implement in the new emerging software defined apparatus, and there will be no interference complaints to investigate, as long as all the signal and its distortion products are contained within the designated “W data, ACDS” or “?” band segments. This should save the FCC “costs”, since no enforcement manpower is needed in this segment any more. In any event, it is up to the system operators to coordinate their frequencies in their segment to their satisfaction, and any interference that may occur, can be resolved by their own “self policing”. What could possibly go wrong? As long as their signals or distortion products do NOT go outside the specified band segment, CW, narrow mode digital, and VOICE/IMAGE operators do not care; no costly enforcement issues with them now either.

As far as costs occurring from implementation of this amended 16-239, such as loss of life or property damage in emergency situations resulting from failure of Winlink or other such new digital technology created, it is all covered by insurance, and therefore not any expense or of any concern to the FCC. If FEMA is not satisfied with Winlink performance due to “congestion” from internet third party users, they always have MARS frequencies. “Currently the U.S. Coast Guard email system is not set up to accept or respond to emergency SAR messages. If you are in distress or need to report an emergency, do NOT send it via email, contact the Coast Guard via telephone or radio.” From:

https://www.uscg.mil/hq/cg5/cg534/Contact_CG.asp

This is not what Winlink, SCS, Maritime radio sellers or ARRL hype. Read their websites. Then read the actual Coast Guard “Bounty replica” sinking hearings to get the real truth.

NOTE 5: I insist that the above information is NOT a joke or a “reductio ad absurdum” argument. I am totally serious that FCC should proceed exactly as I propose here to modify 16-239. This is a complete win-win for new wide digital mode experimentation, existing CW, narrow band digital, VOICE/IMAGE, ARRL, and the FCC. ARRL and Winlink get more frequencies to explore the promise of new faster digital modes. Even the Maritime community wins big in this one. They get FREE FAST INTERNET on amateur radio! No one cares if Sailmail loses a few customers, FCC is not in the business of picking winners and losers. Hooray for the free market!

Kicking the can down the road has “cost” consequences later. Don't procrastinate – REGULATE!

Respectfully submitted, Janis Carson, AB2RA

/s/