

My name is William C. Hulley. I am a licensed radio amateur (extra class) and my call sign is K7WXW. I am also member of the ARRL.

As a radio amateur and member of the ARRL, I wish to make it clear I disagree with the ARRL position as described in their comments filed on September 17, 2019.

The 300 Baud Rule should not be deleted unless the following three provisions are simultaneously enacted:

(1) All automatically controlled digital stations (ACDS) below 30 MHz, regardless of bandwidth, are authorized to operate only within the ACDS bands designated in the FCC's Rules, 47 C.F.R. 97.221(b);

(2) All digital mode stations that operate with a bandwidth greater than 500 Hz also must operate within the ACDS bands designated in the FCC's Rules, whether or not automatically controlled;

(3) No digital mode station may employ a bandwidth greater than 2.8 kHz in any band below 29 MHz;

Thank you,  
William C. Hulley  
K7WXW