

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC, 20554

Timely filed November 10, 2016

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

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

To the commission:

**CORRECTION TO COMMENTS ON FCC WT 16-239, BASED ON IARU REGION 2 HF BAND PLAN  
REVISION DATED OCTOBER 14, 2016 REPLACING SEPTEMBER 27, 2013**

**MY EARLIER FILINGS TO BE CORRECTED:**

<https://ecfsapi.fcc.gov/file/1091422828084/filing%2016239%20changes%20to%20fcc%20part%2097%20B.pdf>

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

PREVIOUSLY FILED:

The IARU, which represents 160 member nations officially, has put forth a band plan recognized by the whole world's nations regulatory agencies. That qualifies as "generally applicable standards" and is referenced multiple times in this filing later in the detailed band plans. FIRST AND MOST IMPORTANTLY HERE ARE THE IARU "GENERALLY APPLICABLE STANDARDS" FOR MAXIMUM DATA BAND WIDTH AT HF:

**[REMOVE BROKEN LINK TO OBSOLETE 2013 IARU REGION 2 HF BAND PLAN]**

## **160 METERS**

Frequencies (kHz)	BW (Hz)	Mode	Applications and observations
1800-1810	500	DM	
1810-1830	200	CW	CW QRP Center of Activity 1812 kHz
1830-1840	200	CW	CW Priority for intercontinental operation (DX window)
1840-1850	2700	CW, SSB	SSB Priority for intercontinental operation (DX window)
1850-1999	2700	All modes	SSB QRP Center of Activity 1910 kHz
1998-1999	500	CW, DM	ACDS
1999-2000	200	CW	Beacons

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 AND CONFINED TO 1998 - 1999 ONLY. NO WIDE BAND DATA AT ALL ON THIS BAND.

ADOPT THE IARU REGION 2 BAND PLANS AS PART 97 RULES, TO MAKE THEM ENFORCEABLE.

**CORRECTIONS BASED ON NEW IARU REGION 2 HF BAND PLAN:**

**REPLACE NEW WORKING LINK TO IARU REGION 2 HF BAND PLAN REVISED OCTOBER 14, 2016:**

<http://www.iaru-r2.org/documents/explorer/files/Plan%20de%20bandas%20%7C%20Band-plan/R2%20Band%20Plan%202016.pdf>

**CHANGE ONE LINE OF TABLE ABOVE AND REPLACE:**

**WAS: 1998 - 1999 500 HZ BAND WIDTH ACDS**

**CHANGE TO:**

**160 METERS**

1839 – 1840 200 HZ BANDWIDTH CW, DM  
CW Priority for intercontinental operation (DX window),  
ACDS (1)

FOOTNOTES:

1 - ACDS can be used carefully on appropriate frequencies, not to exceed the maximum bandwidth specified for the segment. ACDS should not cause interference to point – to – point and DX communications.

2 – For DM use maximum 200 Hz of BW.

**PLEASE NOTE RULE THAT THE INTENDED BAND WIDTH FOR ACDS IS REDUCED FROM 500 HZ TO 200 HZ AND THAT ACDS IS NOT TO INTERFERE WITH POINT TO POINT AND DX COMMUNICATIONS.**

Respectfully Submitted:

/s/

Janis Carson, Extra Class, AB2RA, licensed since 1959