

FEDERAL COMMUNICATIONS COMMISSION
Washington DC 20554

In the Matter of)	
)	
Amendment of Part 97 of the)	RM-16239
Commission's Amateur Radio Service)	RM-11708
Rules to Permit Greater Flexibility in)	
Digital Data Communications)	

To: The Chief. Wireless Telecommunications Bureau

Via: ECFS Electronic Filing

Comments of James Russell, NQ5L

The proposed elimination of the outdated symbol rate rule is an overdue modernization of the Amateur Service rules. As a practical matter, symbol rate has never been directly related to a maximum baud rate unless some specific modulation scheme is specified in such a way as to establish such a relationship.

Opponents of this extension rely on a lack of understanding of the current use of Pactor III and a failure to recognize the modest nature of the proposed changes. Digital communications is now an integral part of the emergency response component of Amateur Radio and has been for some time. The ability to accurately and rapidly transmit data (including digital and image files) is something no other mode can provide. Pactor III and Pactor IV have proven their significant technical advantage time after time in emergency situations.

I personally used Pactor in 2005 in the aftermath of Hurricane Rita to communicate emergency operational items, including sending spreadsheets over HF radio as an email attachment for support of operations in East Texas. Commercial services were simply not available in the area for several weeks following the hurricane.

In my experience, no amateur operator or organization has ever promoted using email over radio as a free alternative to commercial services, but as a very viable alternative when commercial services are not available. That is a specious argument and should be disregarded. For example, I often camp in remote areas where cell service and other Internet connections are simply not available. I can use Pactor and the Winlink email system to maintain email contact that would otherwise be impossible.

Anyone familiar with the slow speeds available at best over HF radio would never use that if there were a commercial alternative available. Characterizations that "The only current use for Pactor on the amateur bands is for email and file transfer to bypass commercial services" show a lack of knowledge and a lack of respect for those of us who choose to engage in public service as a vital and necessary component at the very heart of amateur radio.

The real facts are that Pactor IV is a more efficient modulation scheme, using no more bandwidth than Pactor III but with more robust performance. The Commission itself has

recognized the benefits by authorizing the use of Pactor IV on a limited basis in support of emergency situations. There has been no deleterious effects reported on other operations from the use of Pactor IV that I am aware of because of this.

The responses in opposition to this proposed rule making have not demonstrated and reasonable, cogent argument or any concrete data that the rule change would have any deleterious effects on current amateur radio operations. The converse side is that there has been real world positive results in emergency communications when the Commission has allowed Pactor 4 operation under limited authorizations in the past.

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