

## REPLY COMMENTS AGREEING WITH BRUCE PERENS IN OET 17-239 RE: AMPLIFIERS

Reply to original Bruce Perens comments at:

[https://ecfsapi.fcc.gov/file/102617713456/Perens\\_ET\\_17\\_215.pdf](https://ecfsapi.fcc.gov/file/102617713456/Perens_ET_17_215.pdf)

By Janis Carson, AB2RA

Timely filed for REPLY comments Monday November 27, 2017

The original Perens comments state:

PERENS Page 8 Paragraph 5.1

*“**§97.317(2)** This currently states:*

*Not be capable of amplifying the input RF power (driving signal) by more than 15 dB gain. Gain is defined as the ratio of the input RF power to the output RF power of the amplifier where both power measurements are expressed in peak envelope power or mean power.”*

*“This rule is no longer needed, because modern amplifiers can be disabled for the Citizens Radio Service dependent on frequency, with high precision in the measured frequency due to the use of inexpensive microprocessors and crystal-controlled digital frequency counters. Many modern amplifiers already measure frequency with high precision as part of their normal operations, thus all that is needed for such amplifiers is a software change.”*

PERENS Page 9 Paragraph 5.1.1

*Recommendation: **Delete this rule. §97.317(2)***

**I ABSOLUTELY AGREE. THIS IS LONG OVERDUE, AND AN UNFAIR BURDEN ON LAW ABIDING AMATEUR RADIO OPERATORS.** Furthermore, by integrating most of the power gain inside the amplifier unit, less distortion can be achieved, resulting in low splatter or unwanted band width.

PERENS Page 9 Paragraph 5.2:

*“**§97.317(3)** This currently states: Exhibit no amplification (0 dB gain) between 26 MHz and 28 MHz. This is again a rule intended to prevent use of amplifiers with Citizens Band transceivers. This specification is unnecessarily broad for today’s amplifiers, in that the exact frequency limits of the Citizens Radio Service and nearby commonly-abused frequencies can be specified for locking out, without interfering with other services. As written, the gain restriction reaches the lower edge of the Amateur 10-Meter band.”*

**I ABSOLUTELY AGREE.** However, the upper limit of 28 MHz is required because the spectrum between CB and the lower end of amateur 10 meter band is used by so-called “free banders” that modify CB equipment for out of band operation.

PERENS Page 9 Paragraph 5.2.1

*Recommendation: Reduce the 0 dB gain band to the practical minimum necessary for lockout of Citizens Band radios, and commonly-abused nearby frequencies, but allowing:*

*Frequencies legally used by Radio Amateurs.*

*Frequencies that Amateurs might legally use while traveling in other nations.*

*NTIA-allocated frequencies used by the Civil Air Patrol and the Military Amateur Radio Service*

**I ABSOLUTELY AGREE.** The Ameritron ALS-1306 already meets all these criteria (except for the 15 dB gain rule) and uses the exact techniques Bruce Perens describes.

PERENS Page 15, in closing heading:

*“Please consider the initiation of rule-makings to address the issues I’ve brought up.”*

**I CONDITIONALLY AGREE.** FCC rule making is ALREADY underway on this topic, and there is no need to “initiate”. The rule making is:

<https://www.fcc.gov/ecfs/filing/60001536394>

April 2016 is the filing date of the petition.

**It would be excellent if the FCC would act immediately within the one year window as recently promised by Ajit Pai to enact this RM-11767 into law, without further delay.**

It is unfortunate that multiple duplicate petitions result when the FCC is not able to clear the agenda for what is so clearly a needed change.

Respectfully submitted,

/S/

Janis Carson, AB2RA, licensed since 1959, Extra Class, ARRL member 40 years