

Before the
Federal Communications Commission
Washington, D. C. 20554

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In the Matter of) WT Docket No. 97-12
)
Amendment of the Amateur Service) RM-8737
Rules to Provide For)
Greater Use of Spread)
Spectrum Communication)
Technologies)

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To: The Commission

REPLY COMMENTS OF
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June 3, 1997

INTRODUCTION

I have been an amateur radio operator for the last seven years, and have held the extra class license for most of that time. I am very active in the digital, voice and satellite aspects of Amateur Radio. Although I am a member of the American Radio Relay League, Tucson Amateur Packet Radio Corporation, and the Radio Amateur Satellite Corporation, I am speaking only for myself. I submit these comments in response to the above-referenced notice of proposed rule making (the "NPRM") released by the Commission on March 3, 1997, and to the comments filed since.

DISCUSSION

I am pleased that the commission has decided to consider new rulemaking on spread spectrum (SS) communication within the Amateur Radio Service. However, I feel that the proposed changes are too restrictive.

The proposed section 97.311(b) continues to relegate SS communications to second class status. New technologies in the past, such as single sideband and packet radio have not burdened with such rules, and it seems to me unfair to do this with SS. Section 97.101 already covers the requirement for coexistence of various operators and modes within the Amateur Radio Service, and provides adequate protections to current users.

Likewise, the proposed automatic power control provision of section 97.311(g) is needlessly restrictive. I understand the intent of this section, but automatic power control adds another level of complexity to the design of experimental radios. This would serve only to smother experimentation in this new mode of communications. Likewise, the 100 watt limit on total power provides no additional protection to other users, but limits one of the more interesting uses of SS, namely moonbounce communications.

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Sections 97.311(e) and (f) place a significant record-keeping burden on any operator who wishes to make use of the SS emission mode. Again this singles out SS communication without providing any specific benefit to amateur radio or the Commission.

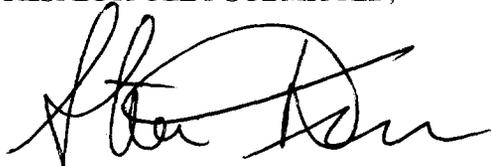
I would also ask that the Commission eliminate the requirement of section 97.119(b)(5) for morse code identification. This requirement of a cross-mode identification would be likely to cause interference, and a monitoring station would find it quite difficult to associate the narrow band CW emission with a particular SS signal. It also precludes the use of all commercially available equipment.

CONCLUSION

The Amateur Radio Service has a long tradition of innovation in communications. However, as radios have gotten more complex there has been less opportunity for the ARS to further the state of the art. There are now a significant number of amateurs anxious to explore the exciting possibilities of SS communications. The present rules, and to a lesser extent, the proposed rule changes, impede that experimentation.

The introduction of new communication methods have always brought objections from more entrenched users. As the conflicting comments before the Commission indicate, no consensus exists as to how much spread spectrum communications will impact on more traditional means of communication. The results of amateur experimentation could be quite useful to the Commission in addressing questions sure to arise in the coming decade. I ask that the Commission remove these unnecessary restrictions standing in the way of such widespread experimentation.

RESPECTFULLY SUBMITTED,

A handwritten signature in black ink, appearing to read 'Steven S. Dimse', written in a cursive style.

Steven S. Dimse K4HG