

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

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

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To: The Commission

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Reply Comments of John C. Koster, W9DDD

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June 2, 1997

Introduction

I respectfully submit these reply comments to the Commission regarding the Notice of Proposed Rulemaking that proposes to change certain rules governing spread spectrum operation in the Amateur Radio Service (ARS). I am a licensed Amateur Radio Operator, station callsign W9DDD, a director of Tucson Amateur Packet Radio Corporation (TAPR), and an employee of Control Systems International, Inc. (CSI), however the opinions expressed herein are strictly my own and do not represent the opinions of TAPR or CSI.

Overview

Over the years I have observed that amateurs have a tendency to ask, through their national organizations, for overly restrictive and conservative regulations for new modes of operation. The Commission typically gives us what we ask for. Invariably we then come back later to ask that these restrictions be relaxed or eliminated to give that new mode parity with other existing modes. I hope that with the few changes outlined here there would be little need to modify SS regulations in the future.

Discussion

The comments of several organizations express concern for possible interference if the proposed rulemaking is adopted. Protection is already afforded current occupants

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of spectrum in section 97.311 (b). Any additional language would not appear to provide additional protection.

Automatic Power Control has been proposed as a means to minimize interference. As others have commented, there appears to be no practical way at this point in time to implement this in a multipoint environment. I expect that multipoint operation will be the more prevalent mode of operation in the Amateur Radio Service (ARS). Of necessity an Automatic Power Control would have to adjust the power to accommodate the greatest path loss, thereby affording minimal advantage over operating with a fixed or manually adjusted power level.

Commenters have not detailed how the additional record keeping requirements proposed to be imposed by 97.119(b)(5) on SS will be of any value to the Commission or others beyond that which the current record keeping requirements for other modes provide.

Several commenters have asked that SS be excluded from various portions of the spectrum about 50MHz. They cite the case that in particular the 144-148 and 420-450 MHz bands are already congested in many parts of the country. They overlook the fact that SS is the one mode best suited to help relieve this congestion and less likely to interfere than would trying to add additional narrowband channels to the mix..

#### Conclusion

I ask that the Commission implement the proposed amateur SS rule in this proceeding with the following changes:

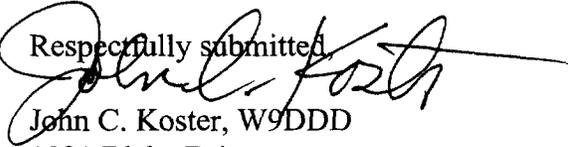
The spectrum allocated for SS should be all ARS frequencies above 50MHz.

The proposed power control requirements of section 97.311(g) should be not be implemented as they are impractical in a multipoint environment and probably ineffective.

The record keeping requirements of 97.311(e) should be no more burdensome than for other modes of operation in the Amateur Radio Service.

The proposed narrow band ID requirement be removed from section 97.119(b)(5).

Respectfully submitted,



John C. Koster, W9DDD  
1821 Blake Drive  
Richardson, Texas 75081