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November 5, 1997

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Office of the Secretary
Federal Communications Commission
1919 M Street, room 222,
NW, Washington, DC 20554.

Mr. Secretary,

I humbly and respectfully request acceptance of the petition for "Request for Rule Making" enclosed with this cover letter.

I am including, with the original, nine copies of the petition for circulation to the Commissioners and appropriate departments and staff. I am also including a disk with this petition in Wordperfect formats version 5.1 (filename 80metera.v51) and version's 6, 7, and 8 (filename = 80meterb.v6).

Thank you,

William Houlne

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Before the

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FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Amendment of Title 47 Part 97 of the Commission's Rules	)
to improve Spectrum efficiency and utilization of the 80-	)
meter Amateur band segment and to provide for a more	)
orderly path of advancement and educational achievement	)
through direct operational experience for the "Technician	)
Plus" class Licensee.	)

To: The Commission

PETITION FOR RULE MAKING

Submitted on November 5, 1997

By: William C. Houlne
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INTRODUCTION

The intent of this "Request for Rule Making" is to help alleviate serious overcrowding issues and social pressures that face the Amateur Radio service in the 80-meter Amateur band spectrum. This strategy provides efficient usage of the 80-meter band without the need to acquire additional spectrum territory. A perfunctory shift in policy is all that is required. The second aspect of this proposal is to provide a realistic and practical environment for the "Technician Plus" class to experience a broader aspect of the Amateur Radio spectrum by allowing for new challenges and horizons that would stimulate self improvement and advancement in the technical arenas through direct involvement.

DISCUSSION

The demand for increased usage of the radio spectrum is at an all time high, most notably within the commercial arena. Elements of the Amateur community are also on the lookout for new horizons in spectrum allocations. The rush to acquire space has brought many new entities into the communication community. Primarily, new advances in technology and increasing commercial demand drive the current thrust for more communication channels, both within the U.S. and worldwide.

Amateur operations below 1 gigahertz are very congested, with some spectrum segments totally loaded. Of all the various communication services under the Federal Communications Commissions' (FCC) jurisdiction, the Amateur service has the poorest utilization of its assigned spectrum segments below 30 MHz.

In 1969 the FCC created a new "Advanced" license class, and a "CLASS" structure that divided the various Amateur spectrum segments, below 30 MHz, into further subbands for each license class. The intent was to force General Class Licensee's to upgrade to regain spectrum that they would otherwise lose. The expected rush to enhancement did not materialize. "Advanced" class licensees still operated with their friends in the General Class portion. The primary effect was a general reduction of operating

space for the majority of Amateur licensees that used the spectrum below 30 MHz. This has produced severe crowding conditions. With the progression of time and the population increase on the Amateur bands, the general unrest has grown due to overcrowding. This appears to be the main reason for many interference issues. Other reasons are a general decline in respect and courtesy, and general disregard for lawful order.

Of all the spectrum segments below 30 MHz, the 80-meter band suffers the greatest disparity and is the easiest to correct. The Amateur 80-meter band segment suffers from severe crowding in the voice portion, and in particular the general class section. "CW" parts of the 80-meter band have always been ***very*** lightly used, even the novice portion has never had much activity. The few stations that use "CW" could easily operate the bottom 50 KHz without interfering with each other. Add another 50 KHz and that would more than take care of any data/rtty mode activity. What this indicates is that approximately 200 kHz sits vacant with no activity.

Of the three most popular HF Amateur bands (80/40/20-meters), the 80-meter band segment is the band of choice for early evening and nighttime operation. While 200 KHz of space remains virtually vacant on the 80-meter band, not to mention the almost unused 160-meter band, suggesting that the Amateur community should request new frequency segments would not be prudent. Realignment of the 80-meter band assignment would alleviate the crowded conditions and improve the social conscience.

Therefore, this proposal puts forth the following modifications to Amateur Radio Service 80-meter band segment:

1. Due to the inherent non productive nature. abolish the current class partitioning limitations on this band for the "General. Advanced and Extra" class licensees.
2. Realign the "CW/DATA/RTTY" only portion to the bottom 100 KHz between 3.5 MHz and 3.6 MHz.
3. Realign the "Novice" segment to coincide with item two above. There is no reason to put the "Novice" operator in his own space. This would enhance the opportunity for the

"Novice" to be challenged and provide a broader range of operational experience with other license classes.

4. Realign the "VOICE" portion to include the upper 400 KHz between 3.6 MHz and 4.0 MHz. This would provide the broadest use of the spectrum on the Amateur 80-meter band.

5. Create a "Technician Plus" subband of the Amateur 80-meter band between 3.6 MHz and 3.7 MHz allowing only CW, AM, or Single Sideband, with a maximum power output from the final power stage of 500 watts. (This will be discussed in further detail below).

6. Specifically restrict data transmissions to "General, Advanced and Extra" class licensees between 3.5 MHz and 3.6 MHz.

7. Limit power output to 200 watts for the "Novice" class licensee, 500 watts for the "Technician Plus" class licensee and 1500 watts for "General, Advanced and Extra" class licensees between 3.5 MHz and 3.6 MHz.

The "NO CODE" aspect of the Amateur Radio Service has both blessings and drawbacks. It has allowed easier entry and opened new horizons. However, the majority operation of the "NO CODE" licensee is FM through repeater stations using commercial equipment that amounts to nothing more than intercomm systems. Very little exposure is available for other aspects of the Amateur Radio Service.

Due to poor propagation conditions on the 10-meter band, most, if not all, "Technician Plus" licensees operate in the VHF spectrum. A long-standing fact of the "Technician Plus" license environment is that the code was a necessary evil and operation below 30 MHZ was not viewed with any interest. The primary interest of many "Technician Plus" (pre-1983) licensees dealt with mechanisms that were particular to the spectrum above 50 MHZ. Secondarily, the legal standing that prevailed for many decades was that the "PLUS" license did not automatically convey the privileges of the lower class "Novice" license. This acted as a brick wall totally segregating, or splitting, the Amateur community into two distinct parts.

The finality of the "CODE" / "NO CODE" Technician license structure is no visible and viable path for an interest to upgrade from the "No Code" to the "Plus" license. This key element is most likely an unspoken fundamental basis for the current rush to delete CW ("the code") from the requirements of the Amateur Radio Service. The move from "No Code" to 13 words per minute is a very big jump for a "No Code" licensee and obtaining the 5 words per minute speed does not produce enough functional difference for the "No Code" to move to the "Plus" license class.

To provide a visible and viable bridge between the "No Code" environment of the VHF community and the total Amateur experience, I am proposing allocating additional operations in the HF spectrum, besides the 10-meter band. for the "Technician Plus" license class. The precedence for allowing operation below 30 MHz with 5 words per minute "CW" was set with the inclusion of the "Novice" license class from several decades ago and more recently with the inclusion of the "Novice/Technician Plus" 10-meter band segment.

The rationale for additional HF spectrum is to provide a useful range of operational experiences across a broad category of communication and technical phases of the radio art. The decision to select the 160-meter and 80-meter band segments is to provide a rich environment for increasing skills in the technical phases that are markedly different from those gained in the VHF spectrum. These enhancements provide a working environment for learning and building simple transmitter and receiver projects, and, constructing antennas necessary for the new frequency allocations. This would be consistent with the basis of Parts 97.1(b), (c), and (d).

No additional HF band segments were considered for the "Technician Plus" class license. The primary purpose of the lower HF assignments is to provide more of a technical environment and not just the superfluous attempt to add privileges without merit. Worldwide communication is possible on the 10-meter band segment already allocated to the "Novice/Technician Plus" license classes.

The 160-meter band is very lightly used and with the proposed changes to the 80-meter band, there will

be more than enough capacity for the additional "Technician Plus" licensees. Therefore, this proposal puts forth the following modifications to Amateur Radio Service 160-meter and 80-meter band segments:

1. Create a "Technician Plus" subband of the Amateur 160-meter band between 1.9 MHz and 2.0 MHz allowing only CW, AM, and Single Sideband, with a maximum power output from the final power stage of 500 watts.
2. As noted above in item five of the 80-meter band change request, Create a "Technician Plus" subband of the Amateur 80-meter band between 3.6 MHz and 3.7 MHz allowing only CW, AM, and Single Sideband, with a maximum power output from the final power stage of 500 watts.

CONCLUSION

Many groups of people are debating sweeping changes to the Amateur Radio Service "rules and regulations." While grounds exist for change, the fundamental basis for such reform should be carefully weighed against the standards stated in Title 47, Part 97.1. Reform should not only benefit the people interested in the change but should first provide an enhancement to the service as a whole. These ideals were the basic measurement of this request for rule making.

Respectfully, I urge the Commission to issue a "Notice of Proposed Rule Making" at the earliest possible date.

Respectfully submitted,

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