I am writing to support the ARRL's request to allow higher symbol rates than are currently allowed. Specifically, I strongly support a change in the regulations to allow the use of PACTOR 4 technology.

My support for the change rests on three points. Foremost, part of the purpose of the amateur radio service is the advancement of radio and communications technology. Denying the ability to research and implement higher symbol rates directly contradicts the very purpose for amateur radio.

Second, the proposed change poses no new burdens on existing bands and frequency use plans. The bandwidth occupied by PACTOR 4 transmissions is no more than that used by existing technology: single sideband phone communications. Arguments that increased symbol rates would, in some fashion, cause problems with existing frequency use simply ignore that a signal a bandwidth of 2.8KHz remains the same whether the signal content is speech or data.

Third, it must be born in mind that PACTOR technology is a proven technology used on many HF frequencies outside of amateur radio bands. Commercial, government, and NGO entities use PACTOR 4 technology routinely. Should this use pose problems in the HF spectrum, they would have been well documented by now. Such is not the case.

Finally, increased symbol rates will lead to reduced use of amateur radio frequencies. Specifically, faster data rates mean a given amount of data is transferred in less time, reducing the length of the overall contact.

Point one, that amateur radio serves to advance radio technology, is self-evident based on existing FCC regulations and proceedings. I can personally attest to the veracity of points two and three.

As a cruising sailor, traveling between the Chesapeake Bay and the southern Bahamas, we initially used the commercial service Sailmail for our emails. Contacts are on marine HF frequencies, similar to amateur frequencies. Sailmail shore stations routinely use PACTOR 4 technology where possible. There are no complaints from entities using adjacent frequencies.

Because of changes in radio signal propagation, sometimes PACTOR 4 communications aren't practical. In those instances, PACTOR 3 or 2 is needed, with successively lower symbol rates and markedly longer connection times, denying out Sailmail users access to shore stations.

In summary, it is my hope that increased symbol rates will be permitted, allowing research to reduce demands on exiting frequency resources. Practically speaking, I look forward to less time spent in communications without fear of electronically intruding on other stations and their activities.

Signed/
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KC3DOO