

To Whom it may Concern:

I am writing in support of the ARRL petition filed under action RM-11708. This petition is asking the FCC to change the rules regarding the use of amateur digital modes in the HF spectrum by replacing the existing symbol rate limit with a more sensible authorized bandwidth limit. This change has innumerable positive effects for Amateur Radio, both in support of the overall stated mission of Amateur Radio, and in the effective use of the public spectrum by Amateur Operators.

Referring to 47CFR97.1 subparagraphs (b), (c), and (e), it is clear that the fundamental governing law intends for the Amateur Service to provide an environment that promotes, not prohibits, the advancement of the radio art as practiced by licensed Amateurs.

Subparagraph (b) states, "Continuation and extension of the amateur's proven ability to contribute to the advancement of the radio art." Certainly Amateurs have lived up to this purpose by developing protocols that can exceed the existing statutory symbol rate limit while at the same time using less spectrum than existing allowed digital modes. However, 97.307(f) directly contradicts this statement of purpose by placing artificial limits on the specific types of technologies that may be used by Amateurs to advance the state of the art.

Subparagraph (c) is even more to the point: "Encouragement and improvement of the amateur service through rules which provide for advancing skills in both the communication and technical phases of the art." This subparagraph states explicitly that the rules are to provide an environment to advance skills in the technical phases of the art, which include but are not limited to the development of new digital protocols that transfer more data with less spectrum, as has been done throughout the Amateur community in recent years. Certainly when the rules no longer accomplish their mission, they should be changed.

Finally, Subparagraph (f), an important underlying purpose is the extension of international goodwill and cooperation with Amateurs throughout the world. Regulatory bodies around the world are moving quickly to accommodate the rapid advancement of technology in the Amateur space. Amateurs who put in their own time, effort, and money to develop these technologies are doing a public good, and should be encouraged to continue. By barring American Amateurs from participating in the world community of development and advancement of the state of the art, the image of America is damaged as others look at her and see only an arcane bureaucracy that is stuck in the past.

The United States is filled with incredibly smart people who can do terrific things with technology, and this fact is quite evident in the Amateur community. It has become abundantly clear in recent years that the rules have been outpaced by technology, and need to be changed to continue to fulfill their stated purpose of supporting the advancement of the radio art, encourage Amateurs to continue to develop their technical skills, and to promote international goodwill by allowing American Amateurs to use the same technology that has become commonplace in the rest of the world.

I sincerely appreciate your time and consideration and hope that you will move quickly to adopt the rule changes proposed by the ARRL in RM-11708.

Sincerely

Frederick Hidle, W2JKT