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The issue is that RM-11708 is too narrowly focused - a transparent attempt to shoe-horn PACTOR 4 into the current rules - rather than a good faith effort to deal with *all* the issues raised by increasing use of digital modes in amateur radio.

ARRL (Amateur Radio Relay League) and amateur radio as a whole would be much better served by a "big tent" approach - one that would look at digital techniques as a whole. The most simple, and by far most effective, approach would be to simply modify 97.305(a) to read:

(a) Except as specified elsewhere in this part, an amateur station may transmit a CW, RTTY or data emission on any frequency authorized to the control operator.

That one simple change would instantly avoid any issue of bandwidth or symbol rate for "RTTY and data" modes operating in the so called "Phone" bands (actually, wideband sub-bands).

With one minor change, we could be discussing issues of much more fundamental importance to the future of amateur radio:

- 1) What is the appropriate bandwidth in the narrow bandwidth sub-bands? Is 2.4 KHz appropriate if PACTOR 3 can be accommodated in the wide band sub-bands? Would 300 Hz, 500 Hz or some other value be more appropriate?
- 2) What is the appropriate level of disclosure that should be required for "documented" codes (data encoding)? Should proprietary and quasi encrypted codes be permitted at all below 200 MHz, below 144 MHz, below 50 MHz?
- 3) Should "documentation" require full disclosure of all encoding, compression and software algorithms plus release of functional, real time, "receive only" software for each of the major PC operating systems?
- 4) Does the current non-specific wording of 97.307(f)(2) referring to the "bandwidth of a communications quality phone emission" need to be replaced with a specific value, say 2.8 KHz, except for ISB (independent sideband) and AM which would be grandfathered at 5.5 or 6 KHz?
- 5) Is it appropriate for automatically controlled stations to be required to have and use an effective "channel busy" detector? Should the operator of any station using a digital mode where the "raw" (speaker) audio is not monitored in real time be required to have, and use, a "waterfall" or "audio spectrum" display in order to "see"/avoid other users on the frequency? If such visual monitoring is not present, should the control operator be required to employ an effective "channel busy" detector?