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Dear Federal Communications Commission:

As a licensed amateur radio operator, WVOH, I urge you to deny RM 11708 and to keep the 300 baud protection for all CW and data signals in the HF CW/Data subbands. Furthermore, I urge you to please bolster the protections of these vital narrowband modes, such as CW, RTTY, PSK31, etc. the way Japan does, and the way the IARU is urging nations to do, where wideband data signals are specifically prohibited from causing interference. To preserve human-to-human communications and to ensure emergency capabilities exist with low power, additional protections beyond the existing 300 baud limit, such as a 500 Hz bandwidth limit, is needed. The 2.8 kHz bandwidth limit being proposed by the ARRL in RM 11708 is much too wide? it is as wide as a SSB signal, and such signals have always been prohibited in the CW/Data subbands. To make matters worse, RM-11708 would allow very dense interference, much more dense in terms of power spectral density than SSB signals due to serial tone modems, that would override and interfere with dozens of current amateur operators by just a single wideband data operator.

Unfortunately, the ARRL has improperly characterized the tremendous amount of interference that would result from RM-11708, and in their petition (they never once address ?interference? in their proposal), and they fail to give solid reasons why their proposal should be adopted. They have cobbled together a rationale by extracting rules from the very lightly populated, channelized 5 MHz band, and have incorrectly represented the importance of the 300 baud limit (an upper limit on human communication by keyboard or key). It is this 300 baud limit that currently provides a defacto narrowband protection to existing CW, RTTY and narrowband data users, despite the growing amount of interference from Pactor 3/WinLink stations that fail to listen before transmitting, and which often fail to identify in a manner that can be received by human listeners.

The US is the 2nd largest amateur population in the world after Japan. Japan has shown a model for regulation by bandwidth, where narrowband users are protected from wideband data interference, as requested by the IARU. I urge the FCC to protect the US amateur operators, as well as global amateur community, from the tremendous interference from wideband internet/email transmissions that RM-11708 would allow. It only takes one 2.8 kHz wide wideband user to completely wipe out the communications of 20 or so CW transmissions, and even more narrowband data (PSK31, JT9, etc.) operators. Just twenty or so wideband 2.8 kHz data users would eliminate the entire RTTY and CW segments of the HF subbands now dedicated to CW and narrowband operations. These stations would likely follow the same pattern of failure to listen before transmit and failure to identify that have already been reported to the FCC in this proceedings. Wideband data, having the width of SSB signals, should be allowed in the phone/image portion of the bands, not the narrowband CW/Data segment.

For the sake of the ?human? element of amateur radio, and to enable emergency communications and low cost access to the hobby, please enforce the 300 baud limit and institute a 500 Hz bandwidth regulation for all CW/Data subbands. I urge you to deny RM 11708. Please act by acknowledging that SSB-wide data signals in the CW/Data subbands is not appropriate, and will cause undo interference that cannot be overcome.

Sincerely,
Myron R. Schaffer