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Dear Federal Communications Commission:

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As a licensed amateur radio operator, KK4X0, I urge FCC denial of RM-11708 and, also, retention of the 300 baud cap for all CW and data signals in the HF CW/Data sub-bands.  
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Also, to preserve human-to-human communications and to ensure that emergency capabilities exist from low power transmitters, I believe that additional protections beyond the existing 300 baud limit, such as a 500 Hz bandwidth limit, are needed.  
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The proposals that the American Radio Relay League (ARRL) have put forth, are in direct conflict with the worldwide guidelines which the IARU is currently urging all nations to implement and follow. These guidelines further protect all narrowband modes, such as CW, RTTY, PSK31, etc. in such a way where wideband data signals are specifically prohibited from causing interference. Indeed Japan, which has the largest number of Amateur Radio operators in the world, has already implemented the IARU suggested guidelines with great success.  
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I believe that the FCC should also follow these IARU guidelines with respect to the RM-11708 proposal. Not to do so would cause great conflict on the HF bands between Japan and other countries implementing the IARU standard and the US ? a country with the second largest population of Amateur Radio operators. Many Amateur Service stations now experience a growing amount of interference from wideband, internet based automated systems utilizing Pactor and WinLink equipment. The 2.8 kHz bandwidth limit being proposed by the ARRL in RM-11708 will only increase this type of interference.  
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Sincerely,  
/s/ William G Harrison