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My call sign is ND2G .

The proposal for rule making should be rejected because the USA is part of ITU region 2. ITU region 2 includes the Americas and Greenland. The International Amateur Radio Association, of which ARRL is a member, offers a band plan for the 3.5-4.0 MHz band for ITU region 2, which has been adopted by most countries in region 2. ARRL's plan for the 3.5-4.0 MHz band would put it in conflict with the rest of Region 2, which allows J3E emissions on the 3.600 to 3.650 segment.

Any changes made to the 3.5-4.0 MHz allocation must be consistent with usage by our neighbors, in particular Canada and Mexico. Both Canada and Mexico permit J3E emission from 3.6-4.0 MHz. ARRL's petition should be denied as it is disharmonious with amateur radio operation throughout ITU region 2.