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I recommend rejection of Rule Making RM-11759 for the following reasons:

The ARRL requests the expansion of RTTY on 80 m to include the frequencies of 3600kHz - 3650 kHz.

Their reasons for this expansion are specious, flawed and inconsistent for the following reasons:

1. There is very little RTTY activity in the existing band segment.
2. RTTY is an obsolete mode and should not be encouraged
3. There are other digital modes in lieu of RTTY that take up less bandwidth and require less power for efficient transmission.
4. The only time I see much activity on 80m is during contests. I don't believe band segment allocation should be allotted based on contests.
5. There is significant phone activity in the present extra class segment 3600-3650 kHz. (I and many others are on 3606 kHz every day).
6. Eliminating the 3600-3650kHz segment would cause crowding on the remaining Extra Class band segment.
6. This proposed rule would reduce Extra Class privileges and would reduce incentive to upgrade from General Class and other restricted classes which is contrary to previous ARRL positions.
7. The existing band allocations have been in-place for some time and changing them now will cause unnecessary confusion.

I respectfully implore the FCC to carefully consider my comments and reject this proposed rule making

Hugh Bowen WC1T