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I do not support the proposal by the ARRL to amend Part 97 of the Commission's Amateur Radio Service Rules to Facilitate High-Frequency Data Communications.

As a licensed Amateur Radio Operator who operates both digital (RTTY et al) and analog (voice) modes, I understand the points raised by the ARRL in its petition. However, I do not believe that the Commission should restructure the 80 meter band to shift the lower 50 kHz of the Extra Class phone band to digital radio communications.

On any given evening there are numerous single sideband (SSB) conversations taking place in the 3600-3650 kHz range by Extra Class operators. Many of these groups have been operating in that range for many years. In that spectrum they enjoy less interference and often better propagation conditions.

Voice modes occupy greater bandwidth, typically 3 kHz for SSB and 6 kHz for AM, than digital modes and as such require more spectrum. Taking away spectrum from modes that require more spectrum and giving it to modes that require less is counterintuitive.

I would thus encourage the Commission to keep the current allocation in the 80 meter Amateur Radio band without modification.