

The CW Operators' Club (CWops) is in favor of the ARRL petition, and recommends that it be adopted by the FCC.

Our membership consists of approximately 1,200 amateurs who are especially active using CW.

In recent years, we've noticed that more and more RTTY/Data stations are using frequencies traditionally used only by CW stations. This trend is worrisome since RTTY/Data modes are becoming increasingly popular. Furthermore, there has been a rebirth of CW activity – especially by newcomers to amateur radio. Together, these factors are expected to eventually lead to serious interference problems between RTTY/Data stations and CW stations. Allocating RTTY/Data stations a larger band of frequencies will reduce their potential for causing interference to CW stations. Therefore, the ARRL's proposed increase in the frequency allocation for RTTY/Data modes is an appropriate way to ameliorate (for now) the increasing RTTY/Data interference to CW stations.

As a long-term solution, we respectfully suggest considering the establishment of CW-only allocations throughout the HF spectrum according to the Band Plans of the International Amateur Radio Union (IARU) available at www.iaru.org. These Band Plans (for each of the ITU regions) harmonize the use of amateur emission modes and have been agreed upon by the national amateur radio societies representing amateurs throughout the world (including the ARRL).

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