Re: RM-11759

To: FCC rulemaking authorities:

I strongly object to the ARRL's recent proposal for rulemaking, known as RM-11759 and ask that it not be approved in its current form.

I was first licensed as a radio amateur in 1966. I was 14 years old. Ham radio has become a huge part of my life. I worked hard to earn my license. I was taught by older amateurs to have respect for operating rules, the FCC, and that "Ham Radio" was a gentleman's hobby. When "incentive licensing" introduced in the 1970s, I worked very hard to earn the extra privileges, including exclusive sub-bands and special call signs. I think incentive licensing was an exceptional and the most positive change to amateur radio rules in my lifetime.

Regarding specific changes to the 80 meter band I think the ARRL proposal has neglected or purposely left out some key points. First, no where in the 20 page proposal is their a clear reference to protecting the exclusive 80 meter sub-band privileges that extra class licenses have earned over many years. In my several inquiries to David Sumner at the ARRL over the past few months I was told that the proposals would retain an exclusive sub-band from 3650-3700 for the exclusive use of extra class licensees. And while this was cut in half (from 3600-3700 currently) many would have considered that a reasonable accommodation in order to provide additional spectrum for data modes. However, after reading the actual rulemaking proposal, I can see no specific reference to protecting any extra class sub band for those of us who have worked hard to earn it.

Next, contrary to the ARRL's proposal, there has not been widely disseminated information on this topic over any protracted period of time. While this may have appeared in obscure sections of QST magazine, not every ham is a member of the ARRL or reads QST magazine. RM-11759 mentions an article for which a thousand readers responded although it fails to mention much about the dissenting opinions resulting from that article. Nor does the proposal mention that when this issue came to light to the general ham population last fall, and was posted to a qrz.com forum, it received more than 14,000, mostly negative responses in only one week.

Moreover, the ARRL proposal also states that their proposals would not negatively affect the upgrading of licenses. This is pure nonsense. When any group of people sees how hard earned privileges are arbitrarily taken away from a group it is common sense that it will negatively affect their motivations to "upgrade."

I am not against change and I do appreciate the interest of expanding data modes as progress. But I think in their desire to accommodate a small number of data mode operators, the ARRL has not handled this properly. As I understand it, all data/cw/rtty gets lumped into the same 3500-3650 sub band. One of your commenters rightly calls this a ?telecommunications mosh pit." Although I am mostly a phone operator, it doesn't make much sense to combine all digital modes into one sub-band.

I propose that an alternative proposal to grant the additional 50 kHz to data modes in an orderly fashion, but retain a 100 kHz exclusivity for extra class operators from 3650-3750 kHz. After all, this is a congested and popular band, and we "extras" have worked the hardest to earn our privileges. They should not be taken away.
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