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I have been a licensed amateur in excess of 40 years. I frequent the proposed section of the band change often and normally hear at least a dozen telephony contacts in progress on any given night. In listening to the upper portion of the existing CW/DATA allocation in the 80 meter band, I rarely hear digital contacts being made, other than occasionally on the informal 'calling channel'. The same can be said of telegraphy in the upper portions of the existing allocation. During telephony operating events, the proposed section of the band change is full of signals from around the globe.

As the FCC's enforcement bureau is well aware, the 75/80 meter amateur band has had its share of poor operating practices in the telephony sections of the band. Making the existing telephony sub-band in the 80 meter band is likely to compound this problem.

While the American Radio Relay League is the cornerstone voice of the amateur community in the USA, I believe they got it wrong on this proposal. In summary, I am AGAINST the American Radio Relay League's proposal as stated in RM-11759.

Thank you for this opportunity to comment.

Sincerely,
Frederick Kieber, K9VV