

Re: RM-11759

Comments by Ron Walters W4LDE – March 13, 2016

As a longtime and current member of ARRL; I am opposed to the proposed expansion of the current 80 meter digital segment as proposed via RM-11759.

I have held a radio operator license since June of 1957 and a Extra Class license issued in June of 1970. I am a active user of all modes and frequencies granted to that license class.

I have been very active in CW and digital communications and have witnessed the evolution from machine style RTTY communications to the current multitude of software based digital communications developed by fellow licensed operators.

Most of the newer digital modes such as JT65, JT9, PSK31 and others utilize as little as 23Hz of spectrum space for communication. The old RTTY mode is common for contests and DX expeditions and unfortunately does consume a larger frequency bandwidth, almost ten times, than many of the new and popular software based digital modes.

In my opinion a small and special interest group is behind RM-11759 at the expense of the Amateur Extra Class licensees. The FCC's own records show that the Amateur Extra Class is the fastest growing Amateur Radio license. New Amateur Extra Class operators have benefited by operating in the current 3600 to 3650 kHz spectrum.

I urge the commission to consider the following:

1. The existing 3500 to 3600 kHz band segment is not over crowded enough to justify an expansion. The new modes of digital communication available to amateurs suggest that the current spectrum allocations appear to be under-utilized except during digital RTTY contests. The current CW (A1) allocated spectrum should be maintained.
2. Elimination of 3600 to 3650 kHz for SSB/AM use may create chaos moving that operation into a 50 kHz wide spectrum from 3650 to 3700 kHz. The 3650 to 3700 kHz spectrum is currently widely active and shared with a wide band AM mode component which requires a significant portion of the spectrum.
3. One only has to look at the existing frequency allocations, as an example, 7.000 - 7.100 and 14.000 - 14.100 MHz, and witness the under-utilization of spectrum except during contests and where unattended automatic transmitting stations have caused interference to normal operator controlled stations. I feel that this issue needs to be addressed before consideration of spectrum modification.
4. With the elimination of a code component to future licensed ham radio operators, it would appear that the SSB/AM allocations may need to be expanded and not contracted. In the future, fewer stations will use the CW mode, where as new digital modes will utilize less spectrum space, not more. It would appear that the proposed rule making is unjustified and therefore should be opposed by the commission.
5. The 2015 ITU World Radio communications Conference offers the opportunity to expand 5351.5 to 5366.5 kHz with digital modes and/or CW activity on a secondary basis on January 1, 2017.
6. I urge the commission to carefully examine the need for a 33% increase in digital spectrum space that appears not to be justified with today's technologies.

Respectfully,

Ronald S. Walters - W4LDE