

I am writing today to support the petition submitted by the American Radio Relay League (ARRL) in RM-11759. I urge the Commission to consider carefully the reasons given for adjusting the upper limit of the RTTY/data segment of the 80m amateur radio band to 3650 kHz. Adopting this petition will do much to improve the ability of radio amateurs to continue adopting narrow-band digital modes in the years to come.

As Solar Cycle 24 is entering its declining years, the lower High Frequency (HF) amateur radio bands will become more important for daily communications and for emergency communications response. Lower solar flux values result in the higher HF frequency bands being suitable for reliable communications less often and for shorter periods of time when they are suitable for reliable communications.

While phone operation is important on the lower HF bands for daily communications during such periods of low solar activity, narrow-band digital modes are becoming more often used for emergency preparations and training. These modes have several touted advantages (including spectrum and power efficiency as well as some modes offer a high confidence that messages are received as sent) for passing message traffic on behalf of the public.

It seems reasonable to me to accommodate the modest expansion of spectrum available to RTTY/data modes on 80m at the expense of some phone/image spectrum available to Amateur Extra licensees. As noted by ARRL in its petition, the number of Advanced licensees will continue to decline in the years to come and the spectrum allocated to Amateur Extra and Advanced licensees between 3700 kHz and 3800 kHz will eventually become effectively available exclusively to Amateur Extra licensees. Adjusting the upper limit of 80m to 3650 kHz represents 25% of the existing Amateur Extra only and shared Amateur Extra and Advanced phone/image spectrum on 75m, but offers RTTY/data a 50% gain over the existing 80m allocation available to present General, Advanced, and Amateur Extra licensees.

This adjustment to the RTTY/data segment of 80m is necessary particularly should the Commission agree with ARRL and grant Novice and Technician licensees RTTY/data privileges. Combined, Novice and Technician licensees account for just over half of all amateur radio licensees in the USA. Should these licensees exercise their new privileges as anticipated, the 80m RTTY/data segment will be very busy especially during the evening and nighttime hours.

In conclusion, I recommend that RM-11759 be ADOPTED.

Respectfully submitted,

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