

Comment RM-11759

I am an Extra Class licensee, KJ8CQ, and operate regularly in the Extra Phone / Image portions of the 75 Meter band. I strongly disagree with and oppose the ARRL's Petition for Rulemaking RM-11759 for the following reasons.

Depending on which article you read, the ARRL claims to have received either 400, 1000 or 1500 responses to its survey. The ARRL claims to have received "more than 1000 responses to an online membership survey." This means only members of the ARRL had an opportunity to comment on a rule change that affects all amateurs. At last count, there are 735,000+ amateur licenses issued. Therefore, the AARL is seeking a rule change based on the input of only 0.14% of the over 735,000 amateurs.

In proposing to take away 50 kHz of phone & Image spectrum in the Extra portion of the 75 meter band, the ARRL's timing could not be worse. When the FCC expanded the band in 2006 there were 108,000 Extra Class licensees. Since that time, the number has grown by 33,000. In 2016, there are over 140,000 Extra Class licensees and the number is growing. This growth combined with the fact that we are now on the downhill side of cycle 24 more amateurs will be forced into the low bands and this will result in overcrowding. Therefore, over the next several years as this solar cycle winds down, and with it the associated declining propagation on the higher bands, amateurs will naturally migrate to the lower frequencies. When this occurs, the Extra portion of 75 meters will undoubtedly suffer from severe overcrowding.

On numerous occasions, including in their filed comments, the ARRL has repeatedly published that the FCC made a huge mistake and/or grave error in 2006 by expanding the Extra phone & Image portion of the 75 meter band. Nothing could be further from the truth. The Federal Communications Commission (FCC) is an agency of the United States Government charged with regulating essentially all communications in or originating in the United States. The FCC is responsible for administering the television and radio airwaves, satellite and cable transmissions, and telegraph communications. This means the FCC has the responsibility for the Communications Act and the entire RF spectrum across the United States. A position at the FCC is prestigious and attracts the brightest and best from universities across the country. To insinuate that the FCC has made a mistake or in some way bumbled a decision is arrogant and presumptuous. The FCC demonstrated great insight by expanding the Extra Class portion on WT Docket 04-140. Conversely, not much is known of the ARRL Band Plan Committee. Upon information and belief, the Plan Committee is a small, informal group of volunteers that meets a total of six (6) times by conference call. Were any Extra Class licensees on this committee, or is the committee mostly representing Amateurs with a digital interest? The question is exactly what are the qualifications of the members of the Band Plan Committee? Do they possess any relevant qualifications to propose regulatory changes? Finally, is the Band Plan Committee representative of all amateurs, and therefor fit to recommend sweeping changes that affect all amateurs?

Are the narrow band modes more popular than the analog voice modes? In RM-10413 the ARRL admitted that, "Wideband telephony remains the most popular mode in the HF band." This remains a fact today. Tuning across the 75 meter band, it is obvious to even the casual listener that wideband telephony is still the most popular mode in use on the HF bands. The narrowband modes have the appropriate amount of space allocated. The entire 80/75 meter allocation is 500 kHz wide and the current narrowband allocation of 100 kHz leaves 400 kHz for Phone & Image.

Using the traditional bandwidths of 3.0 kHz for Phone & Image and .5 kHz for narrowband CW/RTTY/Data reveals there are only 133 channels for phone & image while CW/RTTY/Data presently enjoy 200 channels. However, the 133 channels for phone & image are further skewed by the fact that the traditional bandwidth for telephony has been changing. In the last ten (10) years nearly every transceiver manufacture offers an HF product capable of 4.0 kHz transmitted bandwidth. At the current 20/80 split, the phone/image bands are already disproportionately hindered in bandwidth. The ARRL proposal would move this to 30/70 split. As previously stated, wideband telephony remains the most popular. Therefore, there is not enough interest in the data modes to justify removing 50 kHz of the band from the Extra Phone & Image and reallocating for narrow band use.

The ARRL does not quantify the existence of the purported problem they are attempting to solve with this proposed band plan change. As many have already commented, this is a classic example of a solution in search of a problem. In fact, as detailed above, this proposal will actually create a problem of overcrowding, where no problem previously existed.

For the reasons set forth above I respectfully request that the FCC deny the ARRL's petition.

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