

In opposition to RM-11759:

Yesterday, perhaps sensing the overwhelming backlash from RM-11759, the ARRL dispatched ARRL Bulletin 13 ARLB013 in an attempt to justify their position and mollify critics. Note that comments on this FCC website are running about 3:1 or 75% against RM-11759.

I have made previous objections to RM-11759 on this site already so I will be brief on this update.

The FCC and radio amateurs should note that the ARRL continues to justify this petition by claiming to correct a 10-year-old "error." Back in 2006 the allocation of the 3500-4000 spectrum provided for only 50% of the band for phone related modes, the remaining 50% was allocated to rtty/digital/and CW. I submit that the expansion of the phone bands by the FCC in retrospect was the right decision in 2006. With dropping the CW requirement for any license, the decrease in rtty, and the narrow spectrums needed for other digital modes, when juxtaposed to the expansion of 75/80 phone operation, it made sense to reallocate more spectrum to phone operation. Over the past ten years the 3600-4000 spectrum has become well populated, extra class (and other classes of phone operators) operators have employed this spectrum in a way that is efficient and consistent with incentive licensing and upgrading.

More importantly though is this question: If the objectives of RM-11759 are such an important project for the ARRL that it would deny extra class subband privileges and reduce phone spectrum for generals and advanced licensees, WHY HAVE THEY WAITED FOR TEN YEARS to make this proposal. It seems to me that the ARRL is bowing to the pressures of a small group of digital experimenters at the expense of extra-class and many "old-timers."

I stand by my staunch opposition to RM-11759. The FCC did the right thing in 2006, perhaps inadvertently, with the expansion of the phone segment. The ARRL should discontinue their efforts to deny 75/80 meter phone operators this much utilized spectrum, and discontinue their efforts to take away a valuable subband from those who have worked hard to earn special privileges as extra class licensees.

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