

RM-11759

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Received & Inspected

March 3, 2016

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Federal Communications Commission
Amateur Division
445 12th Street S.W.
Washington, DC

FCC Mail Room

Re:ARRL's Petition for Rule Making (RM11759)

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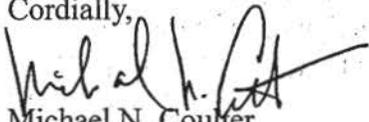
Gentlemen:

As a current holder of an Extra Class License, and licensed since 1954 and therefore with a certain amount of experience over years of HF operation, I want to register my STRONG OBJECTION to this ARRL proposal. I believe it is based on false premises, and serves special interests that may have commercial roots.

1. The data and CW modes they refer to are Narrow Bandwidth modes and given selectivity technology already available for decades, let alone what can now be accomplished with SDR, the current allocations should be more than adequate.
2. Extra Class Phone operation below 3,700 KHz. is required to provide access to a less crowded subband. Those of us who worked hard to acquire Extra Class privileges have historically enjoyed the right to a less congested subband allocation. Given the enormous increase in Extra Class licenses granted over the last few years, the need for a continuing privileges are even more important than previously thought.
3. Therefore the claim that this subband has little or no phone use is incorrect, and is a disservice to those of us who obtained the Extra Class license specifically in order to access and use such privileges as granted.
4. My considered belief is that some commercial interests are being served by this proposal: it opens the door to selling more terminal units, software and demodulation equipment, whereas continuing phone operation 3,600 above KHz with any existing equipment doesn't create additional revenue opportunities.
5. The League's petition claims the proposal to move the phone subband lower limit from 3,600 to 3,650 KHz "received strong support from ARRL members" which discounts the fact that most ARRL members do not hold Extra Class privileges, and are therefore happy to take those privileges away.
6. It is characteristic of large non profits like ARRL to disregard opinions and positions contrary to what they adopt. Our divergent opinions were dismissed, as the present petition proves. Therefore those of us who want to preserve our existing phone privileges down to 3,600 KHz have no option but to file our objections accordingly.

Thanks in advance for your attention.

Cordially,


Michael N. Coulter
W1RF