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Comment on RM-11767 brought by Expert Linears, of McLean, VA
Revision of Part 97.317 (a)(3), relaxation of the 15dB Rule

I support this revision of 97.317(a)(2) proposed in RM-11767.

The future default HF amateur radio station is not a 100-W transceiver followed by a grounded-grid amplifier, but instead a high quality, low power, direct digital sampling transceiver driving a high gain solid-state amplifier---all enclosed within a predistortion closed loop. This very modern approach is not only inexpensive but yields transmitted signals of spectral purity heretofore never seen in the amateur service.

There are now many low-power software-defined radios (SDRs) available to amateurs that far surpass the performance of the traditional superheterodyne designs, but at a fraction of the cost. These affordable SDRs could provide a large portion of the amateur service with superior reception and transmitted purity were it not for the barrier of the 15dB rule of 97.317(a)(2).

The typical 5--10 watt output power of these SDRs now condemn them to a small niche of the amateur fraternity, to the rarefied ranks of "QRP." Of course there are 100-W amplifiers for these QRP radios, which in turn can drive a 1.5-kW amplifier, but the transmission spectral purity of the SDR is lost in such an (expensive) cascade.

Moreover, because of the SDR revolution, American manufacturers have regained the advantage in amateur transceiver manufacture, with concomitant spillover into commercial and military contracts. This advantage should be promoted.

The 15dB rule has become a weight slowing progress in the diffusion of superior technology into the amateur service.

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