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Before the
Federal Communications Commission

In the Matter of

Amendment of Part 97 of the
Commission's Rules to Amend
Section 97.317 by Removing
Reference to the 15 dB
Gain Limitation

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RM-11767

COMMENTS OF JAMES DALLAS, AD5NL

I write to the Commission today in support of Expert Linear's petition for rulemaking.

As the petitioner notes, the motivation for the 15 dB gain limitation was to prevent the marketing of high-gain amplifiers to Citizen's Band users.

I agree that there are many users of the Citizens Band who continue to operate excessive amounts of power out of technical ignorance, notwithstanding the illegality.

However, much of what I have seen marketed to them is either old amplifiers built during the 1970s (which Section 97.317 does nothing to prevent), or "export radios" and amplifiers that are sold quasi-legally online.

I believe that quality amateur product will be distinguishable, from an enforcement standpoint.

Furthermore, there seem to be two motivations for limiting CB operators to 4 or 12 watts out. The first is safety -- and limiting amplifier gain does not exactly solve that problem. The second is concern for TV interference that can be caused by harmonics of CB radios and amplifiers.

However, with the recent introduction of digital ATSC broadcasting, I think the potential for harm from CB harmonics has been greatly reduced.

Certainly, the costs of the current rules must be weighed, and it seems to me that arbitrarily limiting gain at 15 dB is preventing innovation and practical amateur applications.

Submitted respectfully,

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