

Regarding Petition  
For Rule Making (RM-11767)

I agree that the requirement for output gain to be limited to within Amplifiers manufactured for the Amateur Service and to be used within the United States should now be dropped as a requirement from the Amateur Radio Service. With an increase in Technology and improvement in shielding and filtering in addition to the advance of Digital technology; the dropping of a requirement of a minimum of 50 watts required to drive an Amateur Service amplifier would allow further experimentation into low power Amateur Service amplifiers without having the requirement of a minimum of 50 watts drive power with no more than 15dB of amplification limit to be needed for the maximum output power of 1500 watts within the Amateur Service.

I agree to and advise for dropping the 15dB gain amplification limit; dropping the 15dB gain amplification limit would allow for further experimentation and further design of low-power transmitter technology within the Amateur Service.

Respectfully Submitted;

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Individual from attaching an external RF power amplifier or any device capable of amplifying the signal to a CB transmitter operating in the 26-28 MHz band. Thus, the Commission concluded, an individual who uses an amplifier at a CB Radio Service station would violate a CB Radio Service rule and not an amateur service rule.<sup>2</sup> In order to eliminate redundancy and provide clarity in its rules, the Commission proposed to amend Section 97.317 and to eliminate the disparate restrictions imposed on manufacturers as compared to the restrictions imposed on Amateur Radio Service licensees. It also proposed to allow manufacturers to market equipment in the United States that they may market overseas, and to delete the requirement (then in the Rules) that a manufacturer must design an amplifier to use a minimum of 50 watts drive power.<sup>3</sup> In its 2006 Report and Order in that Docket, the Commission completed its proposed rule revisions.<sup>4</sup> It recognized that methods of preventing RF equipment from transmitting on frequencies other than those intended had been developed, and it amended Sections 97.315 and 97.317 to permit linear amplifiers that are not readily capable of operating in the 26-28 MHz band to be marketed by amateur radio manufacturers.<sup>5</sup> But it did not further discuss the 15 dB amplification limitation, presumably because at that time the typical amateur transmitter emitted at least 50 watts, the power level referred to in the NPRM, so that more than 15 dB of amplification would not be needed to attain the maximum permitted power for an Amateur Radio Service licensee (1500 watts). Although no party advocated retention of the 15 dB limit, it remains in place today. In the intervening years, advancements in amateur radio transmitter technology have led to the availability of highly compact, sophisticated low-power transmitters that requires more than 15 dB of amplification to achieve maximum legal power output.