

May 3, 2016

Comment in the matter of RM-11767

The removal of the 15 db limit as codified in 47 CFR §97.317(2) will encourage new designs and better engineering which are clearly in the spirit of the Amateur radio service.

How an individual Amateur may choose to operate their station, any uncodified well-established amateur practices or traditions are not up for comment at this time and should bear no influence in any FCC decision or action concerning RM-11767.

Emissions standards, spurious emission limits, and peak power limits are defined in 47 CFR Part 97 and are not up for comment at this time.

As clearly stated in 47 CFR Part 97, the rules are to provide for advancing skills in both the communication and technical phases of the art. (§97.1(c) Basis and purpose)

Advancement of the technical phase of the art (§97.1(c)) is conflicted with the existing 15 db rule in place.

Clean transceivers and amplifiers using modern design, parts, and methods may easily adhere to all emissions limits and standards including 1.5 kW PEP limits while exceeding the 15 db gain limit.

The removal of the 15 db limit would be incentive for manufacturers, designers, and amateurs themselves to experiment and advance radio art and science.

There is no apparent technical basis to include the 15 db limit in the rules. As it exists, it hinders rather than furthers the service.

I ask those evaluating RM-11767 and related comments, and to any future rule makers: consider the technical merits and the basis and purpose of the Amateur Service, and then move forward to remove the 15 db gain limit.

Sincerely,
Matthew E. Lehman