

Reference FCC Proceeding # RM-11769

Attempted frequency grabs have always been a part of the tradition of Governmental regulation of telecommunications. Frequently, they are couched in “legalese” terminology in hopes that they will obscure what they are.

The above referenced filing is a classic example of such efforts. The original petitioner seeks to have the Commission overthrow long tradition of the separation of modes within the amateur radio bands, and disguise it with gobbledegook.

The motives for this petition are unclear, except perhaps the likely personal disdain the petitioner holds for the Morse Code. Indeed, considering the traditions of amateur radio, the petition is mean-spirited, actively seeking to antagonize a significant portion of the amateur radio fraternity, and to what purpose?

There is absolutely no persuasive evidence that the present system of mode allocations within the amateur radio bands has in any way harmed the petitioner, or limited his ability to communicate using the digital techniques he espouses. Nor do the present rules limit the potential growth of usage of digital modes.

There is good reason for the present allocations. Digital modes are not compatible with the Morse Code. And there are far more Morse Code operators using their frequencies than people using digital modes. There is spectrum room for both, and we already have in place a system that respects that.

Reasonable people can and do argue that the various allocations within the amateur radio bands could be improved. I believe that the vast majority of licensees are essentially satisfied with the status quo. In any case there is no apparent justification for the proposed wholesale destruction of well accepted practice as proposed by the petitioner.

I urge the Commission to discard this petition with the contempt it deserves.