

To:

May 13, 2016

Federal Communications Commission  
445 12th Street SW  
Washington, DC 20554

From:

Christopher L. Del Plato KQ2RP  
29 N. Mount Lebanon Rd.  
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Re: RM-11769

I encourage the commission to deny petition RM-11769 for the following reasons:

1. Being more than a 'heritage mode', CW is likely the best suited mode for true catastrophic, emergency communication when other, more elaborate and technologically-dependent modes may be rendered unavailable. The preservation of CW segments would provide ongoing incentive for many to become capable in Morse code, or maintain current proficiency as a valuable resource for emergency communication.
2. The petition suggests that some digital modes occupy small bandwidths 'well below the noise floor.' While this is true in some cases, many digital modes require greater bandwidth and, more importantly, 'below the noise floor' is dependent upon band conditions and likely at great distances. What may be below the noise floor in one part of the country/world, can be very strong in close proximity.
3. Digital modes and CW are incompatible in the same 'playground'. There has already been severe enough impact from digital modes to force a move from the traditional QRP CW calling frequency (see ARRL's Considerate Operator's Frequency Guide) on the 40 meter band. With ongoing proliferation of new digital modes and software-driven transceivers, conflict and interference between CW and digital modes will no-doubt increase. Removing the 'fences' that protect CW segments would exacerbate the issue and dramatically increase the number of interference instances.
4. To further points made in 3. above, when two signals of the same mode are attempting to occupy the same frequency, they are able to communicate and come to an agreement for one to relinquish the frequency to the other. When this happens between incompatible modes, this possibility does not exist, and continued interference and conflict become the norm. Separation of modes creates 'neighbors' in the band, as opposed to combatants.

Thank you for your time and consideration.

Sincerely,  
Chris Del Plato  
KQ2RP