

With regard to the proposal in proceeding RM-11769;

The proposed change would promote additional uses for existing spectrum allocated to amateur use, and increase the usefulness of said spectrum to a wider number of amateur radio operators. On the surface, this seems like a net benefit to the amateur community as a whole.

Based on the changing technological landscape, maintaining certain portions of the amateur spectrum allocation as “CW exclusive” is likely a policy worth revisiting. About a decade ago, the FCC eliminated the CW requirement for licensure as an amateur operator. There are many new amateur operators who do not find CW interesting but are interested in the increasing variety of available digital mode communications from both practical as well as research and educational perspectives, many of which would fall under the category of “symbol communications” as defined in Mr. Whedbee's proposal. Leaving some segments of the amateur spectrum allocation thusly exclusive to CW strikes me personally as an outdated legacy policy. With regard to the specific points made in Mr. Whedbee's proposal, point #6 strikes me as particularly strong.

I also feel that it is worthy of note that, having read some of the other responses to Mr. Whedbee's proposal, several of them either imply or explicitly state a belief by their authors that Mr. Whedbee's proposal would in some way restrict use of CW on existing amateur bands. My reading of Mr. Whedbee's proposal is that this would not in any way be the case, and that CW operators would be entirely unimpacted by this proposal other than that certain segments of existing amateur allocations would be opened up to other modes besides CW exclusively.

That said, and as others have brought up in their responses to this proposal, there are technical details specified in several points of Mr. Whedbee's proposal which are potentially problematic and should be carefully scrutinized as well. I also feel as though the definitions for “symbol” and other communications put forth in the proposal are not well-developed enough to avoid the potential for confusion, and that, should such terms be introduced into the rules, their definitions should be clear, concise, and as objective and specific as possible. The proposal also appears to introduce rules which, while perhaps less exclusive than existing rules, are still exclusive to certain modes of operation. Some may, indeed, introduce new exclusions (such as point #25, for example, which may, due to the aforementioned issues with definitions, exclude some currently allowed transmissions under the existing rules related to the 30m band). For these reasons, I cannot voice wholehearted support for the proposal as it stands.

In closing, in a time when spectrum allocations are at a premium, I feel that any exclusive or restrictive rules regarding the ways in which amateur frequencies can be used demands and deserves scrutiny both from the community and from the commission. In my humble opinion, our goal should be to be as open a community as possible, with as few restrictions and rules as possible in order to ensure and maintain courteous, lawful operation within the amateur bands.

- Matt Harris, K1RIN
- Kansas City, Missouri