

Re: Letter in Opposition to RM- 11769

To the Commission:

IT IS RESPECTFULLY SUBMITTED AS FOLLOWS:

There are presently no exclusively CW sub-bands in the entire HF spectrum although Novice and Technician licensees can only use CW from 3.525- 3.600, 7.025-7.125 and 21.025-21.200 MHz. Consequently the purpose of Petition is to eliminate the small sub-bands where CW operation is exclusive to all licensees from 50.-50.1 and 144.0-144.1 MHz on the VHF bands. In the words of the petition "As regards these sub-bands, this has proven both grossly inefficient as well as a manifest under-utilization of those." The petition does not further explain how eliminating the CW exclusivity on those sub-bands would increase efficiency or increase utilization of those bands. It seems that the petitioner is seeking a solution to a problem that does not exist. He produces no empirical evidence whatsoever in support of this position and his argument is devoid of any explanation on how such elimination of CW exclusivity would reduce or eliminate the problem that he perceives. The petitioner's second request is to permit data transmissions with a 20dB bandwidth of 2800 Hz throughout the non-voice segments of the 1.8-30 MHz HF spectrum. Again there is no explanation for why this significant change is necessary or what problem the suggested change would solve except to perhaps increase interference to other narrow-band modes in that band such as CW.

I am an Amateur Extra Class Licensee holding the call N2S0 and have been licensed since 1978. Thank you for your consideration.