

The Commission should not adopt RM-11769

The petitioner creates a new category of emission called "Symbol Communications" which, by his definition is actually referred to as "digital communications" in the vast majority of both professional and amateur discussions and papers. The creation of this new terminology is not needed and will cause confusion.

In a technical sense, Morse Code telegraphy is, in fact, a form of digital modulation known as "on-off keying" or OOK. I don't object to referring to Morse as a digital form of communication. Making a distinction between machine generated Morse and human generated Morse is ridiculous since a well practiced human can mimic a machine in this regard well enough that a person (or machine) receiving the transmission would not be able to tell the difference.

I am a Professional Engineer (EE) licensed in the state of California, and my area of expertise is communication theory and practice. I am also a licensee of the FCC with call sign AD6E.