

5/14/16

To: The Federal Communications Commission

Re: RM-11708 and RM-11769

These proposals seek to increase wide bandwidth mode occupation of the amateur radio spectrum claiming that the existing CW sub bands are underused and inefficient.

I submit that the opposite is the truth as CW and narrowband RTTY signals occupy 500 Hz or less and can be detected easier, due to improved signal to noise ratio with the same location, power and antenna, over a wideband mode such as SSB or AM.

Clearly, 6 CW signals can occupy the same space as a 3 KHz wide SSB signal or almost double that for an AM transmission.

It is essential, in my view, that existing and long standing spectrum allocated to narrowband signals be preserved and protected by the FCC.

More than ever, there are intruders from OTH radars to fishing boat SSB transmissions throughout the allocated amateur radio spectrum among others.

The products from these signals cannot be removed from narrowband signals. However, narrowband signals within a wideband space can be easily filtered out.

If wide band signals were allowed into existing narrowband mode sub bands, the interference would be intolerable.

Even though we are in an era of no code licensees, there is a rise in interest in CW and RTTY activities. Among the examples is the CWOps group which does everything from training licensees to learn the code to weekly on air activities to promote on air participation in mini contests.

Almost every weekend throughout the year, there are multiple radio contests where most include CW and RTTY narrowband activities which at times can fill their part of the spectrum with participation.

Please deny these petitions as they are, in fact, detrimental to the significant number of licensees who employ these narrowband modes that can communicate with other stations when wide band signals might not be heard.

It is essential that the protection the FCC has always provided be continued.

Thank you.

Respectfully submitted,

Jim Monahan, K1PX