

RM-11769, James Edwin Whedbee's request for an NPRM modifying Part 97 to eliminate Morse-code subbands and replacing them with narrowband allocations, is a solution to a problem which does not exist. The examples cited by the petitioner (the only two examples which exist, on the 6- and 2-meter bands) have no negative impact on other operating modes, which have sufficient spectrum. The petitioner is apparently biased against Morse code, evidenced by disparaging language such as "legacy subbands", "nostalgia" and the assertion that other modes—favored by the petitioner—are "orders of magnitude better than Morse code".

I have held an Extra Class license as WI2G since 1988, and in the real world it is very difficult to use Morse code in the presence of so-called "narrowband" signals. A number of digital modes use multiple tones, which are nearly impossible to filter through (by ear or with receiver filtering, however sophisticated) to copy a Morse signal. Reports of the death of Morse code are either greatly exaggerated or wishful thinking on the part of those who dislike the mode, which continues to be used widely (especially on HF) for casual operation, DXing, contesting and--most significantly--in public service as a substantial part of the American Radio Relay League's National Traffic System. The petitioner, with a simplistic distinction between "voice" and "symbol" communications, ignores the inescapable fact that Morse code and JT65 (for example) cannot comfortably coexist; one mode inevitably degrades the other.

I hope the Commission will deny the petitioner's request for an NPRM which would be a step in the wrong direction. Amateur radio needs more Morse-only allocations, not less.