

Petitioner proposes in (12) to avoid future confusion with evolving communications technology, use of the phrase 'symbol communications' for are now called digital modes plus, one would assume, communications by Morse code.

This is inconsistent with the usage of the term 'symbol' in electronic communications technology where 'symbol' refers to an element of a coded representation of a higher order entity such as the letter 'A'. It is not the letter 'A' itself. Petitioner's context for 'symbol' belongs more to the fields of linguistics or perceptual psychology.

Petitioner further claims in (8) that the novice and technician CW emission limitations in HF sub-bands below 10 meters be modified to include digital communications modes. I would suggest that such modification removes an incentive present in the current rules, namely to operate in HF band space which provides opportunity for long distance communications, the novice or technician licensee must either upgrade to general or make the effort to learn Morse code. Yes, there are keyboard code generators and stand-alone or software morse decoders but the incentive to improve one's basic skills still exists and the overall equipment required for communications is simpler. Allowing digital modes in the HF novice and technician sub-bands means purchasing the right equipment, not necessarily learning any new skills.

The only other part 97 sub-band cw emission restriction is the 50.0-50.1 and 144.0-144.1 MHz segments, neither of which are in what could be called crowded bands and both of which are still used for weak signal communications. If petitioner's argument regarding the two 100KHz VHF segments is of the 'use it or lose it' category, then he should offer proof that that an underuse condition exists.

Although the petitioner claims he does not wish to eliminate 'manual Morse Code', he generally denigrates its usefulness and place in 'modern technological communications'.

My younger brother and I were first licensed in 1954 and practiced Morse together for some time with the goal of reaching 13WPM to qualify for the general class license, bypassing the novice. In 1976, I qualified for the extra class license which still required a code speed of 20WPM at that time.

During a period of CW traffic handling, I was impressed by the ability of the human brain to learn signal to noise enhancement and selective attention. Hand sent and aurally decoded Morse is still the simplest effective form of wireless communications when technology required for computer assisted digital modes isn't available or isn't functioning and when conditions for voice modes are not favorable.

I submit that current allocation for digital modes is adequate to provide for the continuous evolution of those modes with time. The petitioner's request to modify emission masks to include 20 db skirt widths may have merit regarding below noise level signal extraction techniques (such as those developed by Dr. Joseph Taylor) in crowded band conditions but other than as 'good operating practice' regulatory compliance may not be practical and measurement to insure compliance requires specialized equipment not generally found in most amateur radio stations.