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Regarding the effect of allowing holders of technician class licenses to operate other digital modes on the 80, 40, and 15 meter bands, I am opposed. A technician who wants to experience these bands on HF currently has a choice of doing so by learning enough CW to operate there, or by learning enough material to pass a general class exam. I don't believe either of these options presents an onerous burden, and I do believe that it is appropriate to encourage either type of learning. No change is needed.

Regarding the matter of reclassifying modes as "symbol mode", "image mode", or "voice mode" by the intent of the final communication, I am more strongly opposed. This achieves no benefit, and causes unneeded confusion. For example, if a station is transferring digital files by packet, do they need to switch to a different frequency segment depending on whether the files contain basic text (symbol mode) versus text with precise formatting and font information (image mode)?

To the extent that there is a need to regulate the frequency segments used for various types of emissions, it should be done based on interoperability, bandwidth, and ability of users to hear other transmissions and avoid accidental interference, while taking into account harmonization with the standards of other nations/regions. It appears no attention was paid to these important practical factors in this proposal.