

I am extra class license (W07R) opposed to RM-11769.

Others have no doubt pointed out how mistaken the operator is with respect to Morse Code transmissions.

They remain both extraordinarily popular and often necessary. It is easy to find, and others have already posted up, concrete evidence from DXing and Contesting that testifies to the continued world-wide popularity of Morse Code far beyond what the petitioner mistakenly claims. I cite this evidence: <http://www.cqwww.com/stats.htm>
This is the CQ World-wide contest, the most popular contest and it is clear that Morse is as popular as voice. In 2015, there were 8251 logs in SSB and 7535 in CW. This rough equality has been true for years. By contrast, CQ WW RTTY (<http://www.cqwwrtty.com/stats.htm>) had only 3,362 logs submitted in 2015, also typical.

While my evidence is only for one contest, it is typical of many contests and is typical of activity generally in my experience. My own experience is "heavier" than many: I have, since 1987, had 42 per cent CW, 26 per cent voice, and 32 per cent "data" (RTTY and other). This is no doubt stronger than many amateurs on the data side of it. But do note that CW is only one mode and my data modes includes a wide pallet of choices including RTTY, PSK, and JT65. So, it remains remarkable the Morse Code outflanks them collectively.

Let me offer some added informal observations that the commission can readily discover for themselves by simply listening to the bands or reading well-established literature.

1. Beyond the official emissions designations, there are well-established band plans that are closely followed by amateurs world-wide. These even include countries with fewer emissions regulations than we have. None the less, they are widely followed. If there are complaints about CW sub-bands, I have never heard them from anyone, anywhere. Disrupting them with these practices, which this proposal would do, would be no finger-snap either.
2. Our large amateur population has traditionally demanded additional mode divisions in the HF bands especially; this is well-understood to have world-wide benefits.
3. The proposals are based on bandwidth and this will be confusing to many in the amateur community. It is not exactly clear who is going to do what and where. Before any such proposal could be accepted, there would need to be much more explanation and coordination with US and amateurs world-wide. Just simply adopting these would cause a large amount of chaos and consternation with existing amateur networks, contesting, and much else in the bands below voice.
4. There are indeed modes with even smaller bandwidth than Morse code, but some of these modes also are not intended for general conversation. Morse is.
5. Many amateurs, in the US and world-wide, continue to ignore radio teletype modes of all kinds. This, too, can be seen in the various statistics one can gather from DXing or contesting. While much great work has been done and we now have many choices, it is clear that many operators still prefer Morse Code over any of them. I am delighted to participate in RTTY, as you can see, but there is no denying that CW is still dominant over RTTY in my amateur experience any time since 1986 to the present.
6. Morse continues to have enormous practical value because of its simplicity. There are still plenty of times and places where someone runs off to some difficult-to-reach location with limited power (a mountain top, a state or national park, etc.) and take little more than a radio (often homebrew), a battery, a simple antenna, and a morse code key. In these circumstances, even a very small item, such as a Raspberry Pi or similar, adds markedly to the complexity of deployment. Morse is just plain easier to do for a lot of things. It is still commonplace for someone

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to take a CW only station on ARRL's Field Day to some location far from commercial power.

For these and other reasons, I oppose the petition which seems factually ill-founded, confusing, and lacking in understanding of how it would disrupt amateur practice world-wide.