

REPLY TO COMMENTS OF JAMES EDWARD WHEDBEE OF 13 MAY 2016 IN THE MATTER OF RM-11769

In reply comments, Mr. Whedbee states that he has no intention of doing away with CW, and that in his own personal station he only hears a handful of terrestrial-based CW contacts using CW on the 6 meter and 2 meter bands in the sections that are reserved for CW-only operations (50.0-50.1MHz and 144.0 to 144.1MHZ

First of all, unless Mr Whedbee employs some form of 24/7 recording methodology that is incorporated into a wideband spectrum analyzer capable of monitoring the entire sub-band without interruption in coverage, his assertion that there are only a handful of terrestrial CW QSO's on either band in any given period are the worst-case "guesstimation". At best he's making a wild guess, and his wild guesses have no place in a proceeding before the Commission which could literally impact tens-of-thousands of other licensees worldwide. Mr. Whedbee apparently ignores or simply does not care that his proposals will affect Amateurs worldwide.

Furthermore, these sub-bands are more often used for weak signal use and experimentation in addition to moon bounce, or EME operation, of which there are scores daily. Again, unless Mr. Whedbee's "numbers" are based upon a verifiable, wideband analysis that is incorporated into a system that also encompasses EME operations, his presumptions are actually worse than wide guesses, they are intentionally deceitful, a matter which bears the scrutiny of judicial investigation as they are offered in support of his petition.

Lastly, He asserts that it is not his intention to eliminate CW operation from the Amateur Bands. Unfortunately, it has also not been man's intention to fish certain species to near extinction in the realm of commercial fishing, but left unchecked and using "bigger and more efficient technologies", we've managed exactly that. Mr. Whedbee's unleashing of 20db or 2800Hz digital modes throughout the Amateur bands will make it nearly impossible for TRUE narrowband modes (ie: CW at typically 700Hz and PSK-31 at 31Hz of bandwidth) to operate.

It is my sincere hope that before even giving further consideration to Mr. Whedbee's petition, the Commission it will compel Mr. Whedbee provide supporting documentation on spectrum-use-vs-modes, to include documentation proving that current methodologies and band planning stymie ANY digital station from being able to operate under current band-planning-by-convention, rather than rule-by-caveat.

Respectfully Submitted,

In Service to the Nation.

/s/ STEVEN JAMES ROBESON
GySgt USMC(ret'd)
Amateur Radio Station K4YZ
Winchester, TN