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Currently an Extra Class first licensed in 1970, I sat before the Kansas City Field Examiner for all of my exams, including the required 20WPM code test. I feel that the NOECN proposal is untenable, certainly detrimental to all orderly uses of the Amateur band allocations, especially Emergency Communications, with now fairly standard worldwide understanding of frequencies used during local catastrophes. Many times, all forms of "standard" communication are disrupted, with Amateur Radio being the only immediate usable method. My firsthand experience was the San Francisco Bay Area, California, earthquake on October 17, 1989, where all telephone communications into the San Jose/Oakland, CA area were overloaded and unusable. I was able to contact an Amateur in San Jose in a clear portion of the allocated SSB sub-band portion of 20 meters and pass hundreds of Health and Welfare confirmations to concerned citizens worldwide.

The popularity of the CW mode in the Amateur community is not diminishing. Were RM-11769 to be accepted, "mode wars" with both extraordinary and deliberate interference will ensue in "proposed shared" segments of our frequency allocations, ultimately being deleterious to all attempting to "share" the allocation between NOECNs three proposed modes.

It can be easily and well documented that the popularity of, as well as spectrum use of, certain modes (i.e. CW, SSB and RTTY to name just three) is extreme... and that our Amateur HF bands are never as popular and utilized as when a collective invitation exists, such as during ARRL, CQ and IARU operating events.

The Amateur community is "self-policing" and we, for the most part, work very considerably together to allow spectrum usage to occur during specified operating events unimpeded by a mixture of multiple emission types requiring multiple bandwidths.

I cannot envision that the FCC could possibly rule favorably on such a proposal, effecting only IARU Region Two, without worldwide impact consideration on both Regions One and Three also.