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This Proposal seems like a self centered attempt to grab spectrum from one group of users in order to serve the desires of another. While the use of Morse Code has been de-emphasized in recent years, it has been noted elsewhere that there has been a resurgence in interest in using CW by Amateurs who were not required to be CW proficient when licensed, including myself. The CW sub-bands bemoaned by Mr Whedbee are small areas where CW can be practiced on air without a lot of competition from mainly automated forms of messaging with which the new CW adherent has not chance to compete. It has been noted that under adverse conditions that CW may be the only viable mode of messaging but that would be only if there is a supply of CW trained operators. I would also suggest that the use of lower frequencies for image transmission, while technically possible, is slow and inefficient due to BW limitations that are inherent in the low frequency itself and images sent in this way would tie up any used frequency for long periods, again limiting access to CW operators. I urge the commission to deny this request in its entirety and preserve a place CW operators can practice their craft. If the commission were to entertain any changes to the CW sub-bands I would suggest that they be made MANUALLY keyed CW only to give new CW operators a chance to actually copy code by ear, since automated CW can be used in the entirety of many bands for contesting and so forth.