No to RM-11708 and RM-11769

To the Federal Communications Commission:

Please deny this petition in it's entirety. It does not serve to enhance the amateur radio service and actually harms a majority of current domestic and international users.

Petitioner claims cw only sub bands are inefficient and underutilized but as has been pointed out there are only 2 bands with cw exclusive sub bands yet the petition seeks to change usage on HF bands where there exists NO cw exclusive areas. Novice and Technicians are limited to cw in certain segments but these are not exclusive as any other class may operate there with any authorized modes including data. Petitioner seems to lack knowledge of current rules and actual band/mode usage.

Petitioner also claims certain digital modes are more efficient due to their narrow band nature and ability to transfer over a shorter period of time the same content as a cw signal, specifically cited is a 9Hz wide mode which can only be JT-9. The problem is a JT-9 transmission is almost a full minute in transmit cycle to send a 13 character message including spaces, cw at even the modest speed of 10 five character words per minute wins this one. Again petitioners knowledge seems to be lacking in this area.

Petitioner seeks to add a new definition to the mode table “Symbol Communications” as defined by the receiving end product. Using this definition any RTTY/ASCII art or Hellschriber mode for example would fall under image mode and not be allowed in the current RTTY/Data sub bands even though they are narrow band transmissions. The content of a digital signal should not matter and the lines become blurred over what constitutes image, data or text, only bandwidth should be a consideration with like bandwidth signals sharing spectrum. There is no current band plan or international licensing authority rule that I'm aware of that doesn't protect narrow band spectrum from voice bandwidth signals, IARU Region 2 band plan for example http://www.iaru-r2.org/band-plan/

The current RTTY/Data sub bands should be limited to 500Hz or less signals and not the 2.8kHz wide signals proposed in this and RM-11708. I know there are currently no bandwidth limitations on digital signals in the sub band but there would be no place to put say a 10kHz wide, 300baud/carrier, signal with out disturbing large numbers of incumbent users. The 2.8kHz wide request in both RM's would allow wider store and forward email stations to over run the traditional narrow band segments and further exacerbate the interference that exists today from these stations. A formal well documented complaint already exists detailing the current interference problem, see FCC ticket #337443.

In both RM-11769 and RM-11708 petitioners state the rules changes are to modernize and update rules to reflect the current state of amateur radio. Perhaps the commission should review Part 97.219 and 97.221 as they are both old rules exploited and abused by some users to the detriment of others. The use of modes not copyable by third parties is also problematic in a service that should be open and visible to all per the current rules and amounts to de facto encryption.

Please deny this RM and RM-11708.

Thany you,
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