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To: Federal Communications Commission

Subject: Please deny RM-11708 and RM-11769

These rulings as requested would be very detrimental to ham radio because:

- 1) CW/RTTY are narrow band modes and a lot of signals can occupy a small amount of spectrum hence they are very efficient.
- 2) Allowing these other signals to occupy what is now protected spectrum for CW and RTTY will cause the spectrum to become much less usable for CW/RTTY due to the fact these wideband signals will "bury" the former.
- 3) Many hams cannot afford large antenna arrays and high power leaving only the narrow band modes for long range effective communications.
- 4) Please consider that CW/RTTY are not obsolete at all. Participation in CW/RTTY contests is actually up even though code is no longer required for licensing.
- 5) There is plenty of room for wideband modes in the phone segments. There is increasingly little space for CW/RTTY - all modes should and can be accommodated.
- 6) Some of the modes proposed for the CW segments are "no listen" which violates a long standing and considerate operating practice in favor of "my signal wins because it is bigger and wider".
- 7) There is evidence that the proponents of this change are trying to substitute free ham radio for commercial services for internet and email access. These folks do not meet the five reasons that amateur radio exists and is awarded favorable treatment by the federal government.

Thank You

William Saulnier N5VR (extra)