

In the Matter of RM-11769:

The petitioner proposes to alter the CW segments to allow for Transmissions by Symbology.

Furthermore, said Petitioner proposes to change the methodology for transmission of CW to Manual methodology, in lieu of those methods that are State of the Art technology. This aspect of this filing is indeed self-contradictory

The proposed State of the Art transmission put forth will indeed create unnecessary ?white noise? due entirely to the nature of digital signals being square waves with rapid rise and decay waveforms. This is their nature, and these square waves are technically well known to generate broad Radio Frequency Interference.

This broad Radio Frequency Interference inherently is a known effect of this transmission methodology. It is a known issue with digital communications circuits that have been in use since the very late 1980s. The main use of this methodology is indeed IEEE 802.3 in all of its forms, and has always been an issue that creates ?crosstalk? in cabling systems. This issue is further exacerbated when it is applied as a Radio Frequency technique, as it is no longer confined within a shielded cable system, but is propagated over the Air Waves without any constraint. Technical observation of this type of signal using an oscilloscope shows this very clearly. I have indeed used this technical observation method while teaching Data Communications as Adjunct Faculty at Park College as part of the Computer Science Curriculum.

This Petition would also limit the bandwidth of Amplitude Modulation methods of communication as put forth in ? 17. The proposal strongly suggests the bandwidth of 2800Hertz. This is incompatible with even Single Sideband communications which is currently 3000Hertz, and would completely eliminate Double Sideband with Carrier, known as Amplitude Modulation.

I submit that this Petition would dramatically alter the entire Amateur Radio Service and do excessive harm to this Radio Service.

It must be kept foremost in mind that the Amateur Radio Service not only is a hobby, BUT also a very important means of Emergency Communications!

The Amateur Radio Service provides Emergency Communications during Hurricane, Tornado, and other Natural Disasters.

Therefore, I must contest this Petition from being formally adopted!