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In response to RM-11769, presently in its comment period, I offer the following.

The petitioner's main thrust, via RM-11769, is the elimination of the legacy Morse Code (CW) subbands in order to allow frequency segment sharing with present and future digital modes.

In addition, the petitioner claims that CW mode is "grossly inefficient" and "manifest underutilization". In reality, nothing could be further from the truth.

As a radio amateur who uses CW occasionally, I can enumerate the folly of his contention of "underutilization."

All one has to do is listen to the bands during any significant contest and hear that HF is covered with CW signals -- sometimes across the complete CW band plan segment.

Nothing is "underutilized" during those times. Worldwide, significant contest activity can be heard most weekends of the year. There is no lack of CW usage in these instances.

Regarding mode efficiency, nothing is more inefficient than some of the digital modes the petitioner supports. Some of these digital modes are structured so that a QSO takes six minutes.

A savvy CW contest operator may make 15-20 QSO's during that same six minutes. The petitioner ignores this by citing the efficiencies of digital signal width (more signals per bandwidth) rather than the clearly superior communication efficiency of CW.

In addition, FCC adoption of this, or a similar, proposal may also result in considerable interference.

The amateur radio service exists because of the service it renders. In an emergency, who would you rather have carrying the load, a savvy CW operator or some casual digital dabbler?

The answer is obvious. CW is needed and should not be marginalized by adoption of RM-11769.

It is imperative that the FCC say NO to RM-11769. I would urge the Commission to fully reject Mr. Whedbee's petition

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