

REPLY TO COMMENTS BY COMMENTOR JAMES WHEDBEE IN REGARDDS TO RM-11759 AND RM-11769

Mr. Whedbee, although verbose and talented with a word processor, is trying to implement changes to those portions of the Amateur Radio bands that have traditionally been "CW Only" even though the only two allocations so restricted by Part 97 are on the 50.0 to 50.1MHz band (6 meters) and 144.0 to 144.1MHz (the 2 meter band) weak signal guard bands.

Although CW is permitted on any frequency allocated to the Amateur Service, it has long been the practice for narrow bandwidth modes to remain below those subbands allocated to voice and image modes due to the inherent incompatibility between the wide and narrow modes.

That voluntary practice, with precious few exceptions, remains in practice to this day.

Physics have not changed since the days of Marconi, and they still don't play well together!

Although released the same day Mr. Whedbee made his comments to this RM, his own petition is already 342 comments to the negative, and other than his own comments, only one in favor of even marginal support of his objectives. Now he comes to this proceeding hoping to push it to acceptance.

One simple truth exists. Allowing high-speed, 2800Hz 20db signal rate stations to operate where stations of no more than 1Khz traditionally operate will be disastrous. Although a great many correspondents believe this is an attack against "CW" or the use of "Morse Code", the simple fact is that EVERY narrowband methodology of emission will be at risk for compromise.

Mr. Whedbee's, and indeed the League's arguments cannot overcome physics. Allowing this petition to prevail would be akin to trying to drive an 18-wheeler down a bike path. It just doesn't fit.

I encourage the Commission to have the foresight to see the damage that can and will be done if this prevails. Both the League's and Mr. Whedbee's proposals are the worst kind of preposterous.

Lastly, I encourage the Commission to consider it's own policies and practices of the last two decades in deregulation of the Amateur Radio Service and dependence on it's traditional practices of self-policing and Gentleman's Agreements to keep relative order. If the Commission takes this to R&O, it will necessitate implementation of new regulations that the Commission will have to commit resources to in order to enforce. The Commission has recently closed field offices and decreased enforcement agents. Can it afford to implement this triple-travesty of an idea into law?

I remain,

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