IN THE MATTER OF NPRM RM-11759 AS PRESENTED BY THE AMERICAN RADIO RELAY LEAGUE

Ladies and Gentlemen of the Commission,

As a 43+ year licensee of the Amateur Radio service, I oppose the implementation of this NPRM in all regards as asked for by the American Radio Relay League.

First and foremost is the intended inclusion of faster, wide-band data modes in parts of the Amateur spectrum that have traditionally accommodated narrowband modes. In the past, "narrowband" was solely the domain of CW, or manually generated Morse Code transmissions, but now encompasses such modes as PSK-31, WSPR, JT-65, and numerous other data modes.

Allowing the proposed faster wideband data modes would be akin to trying to drive a semi truck down a bike path. The truck may experience some scratched paint or dented chrome, but everything in it's way is going to get run over and rendered useless.

Secondly, I oppose the added data modes to the Novice and Technician class licenses on 80 and 15 meters. If operators in those license classes wish to operate those modes on HF, then the Commission should continue to use added privileges as an inducement to upgrade. Considering the Commission has deemed it appropriate to make all of the test questions and their corresponding answers "public domain", there is no reason to simply give away even more privileges without even some token investment in their acquisition. When grade school, and even Kindergarteners, are obtaining Amateur licenses, anyone who argues over the effort required to upgrade is doing nothing more than whining, and dealing with "entitled" adults is NOT the responsibility of the Commission.

Lastly, I oppose the ARRL's assertion that the present phone band on the 75 meter band (presently from 3600KHz to 4000KHz for those holding the Amateur Extra) be scaled back to 3650KHz on the lower end to accommodate data modes. The bulk of data operations already take place on the 40 meter and higher bands, and the demand for spectrum for data operations on the 80 meter band is nil.

On the other hand, the 75/80 meter band is now and has been the workhorse of public service activities, disaster relief, emergency communications, etc. There has been a historical over-crowding of this band, and the dropping of the lower end of the phone band to 3600KHz greatly relieved that congestion. Moving to push back against that lower limit will only re-engage those old arguments.

Indeed, I am presently an Assistant Traffic Manager for the Tennessee Section of the ARRL , and am responsible for six nets. I can personally attest to the greater flexibility that we've enjoyed since the widening of the band, hence more opportunities to conduct operation on more than one frequency simultaneously. Again, withdrawing the bottom 50KHz of the current band will reduce those opportunities.

If the League wishes to provide a wider swath for data modes, it should consider cooperating with groups such as the "30 Meter Digital Group" to consider alternate band plans for that band, to include seeking a wider allocation for digital-only operations in that part of the spectrum. Another source for

digital modes would be the re-farming of maritime HF frequencies that were abandoned with the discontinuation of the use of commercial radio telegraphy.

The FCC's accommodation of digital-only systems in the 219MHz-220MHz spectrum in reparations for the travesty it created when it re-allocated 220MHz-222MHz for United Parcel Service (which subsequently never made use of the allocation it forced the FCC to make) has worked well. There is no reason to believe that similar case-by-case patch-work allocations for certain wideband Amateur digital operations could not be accommodated elsewhere.

I remain,

Respectfully Yours In Service to the Nation

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