

Ref: RM 11769

The proceeding should be denied. Both RM 11769, and the prior RM 11708, do not serve the public interest of the amateur radio community, and represents a clear threat to narrow band operations of the amateur sub bands (CW and RTTY).

The current band structure is the result of thousands of hours of work by the ITU and the IARU; additionally, amateur radio organizations throughout the world. Since the United States is the second largest amateur radio population, wholesale disregard for current amateur radio spectrum allocations would upset operations and activities throughout the world. Radio signals have no geographic boundaries. Adoption of the proceedings would result in untold chaos of a "free for all" (increased QRM notwithstanding), operationally not dissimilar to the "wild west".

CW and RTTY are not obsolete, and the inefficiency dialogue of the proceeding is simple fantasy.

All modes can be accommodated through regulatory definitions of bands and sub bands as currently defined in Part 97 rules and the ITU/IARU plans, but regulatory protection of the spectrum as defined today is needed for such, to maintain some degree of order and conduct. Not to do so would be equivalent to eliminating all local and state automotive driving laws. That is not a good idea either.

Both proposals would allow wide band QRM on top of CW and RTTY. PACTOR and bulletin board operations are current interferer examples of this, where transmissions commence without listening first. The power spectral density of wide band signals is a huge contributor to disruption of these modes, not to mention low power signal communications (i.e. QRP, less than 100W transmitters with dipole antennas, etc.).

QRM to emergency communications/nets, as well as public safety traffic, is another concern under the proceeding.

Immediate denial of both RM's is required and appreciated.

Respectfully,

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