

Wireless Telecommunications Bureau
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

COMMENT: Request for denial of RM-11769

Subject: Amending Part 97 of the Commission's Rules and Regulations to Redesignate Sub-Bands from Exclusively Morse Code to Narrowband Modes, including CW and for Other Purposes

May 30, 2016

Sirs,

I am voicing my concern over an effort to do away with or restructure what has been erroneously called “legacy bands”, related to CW only bands in the HF spectrum of the Amateur Radio allocation, if it is not in exact wording; it seems to be in intent by the filer of RM-11769.

There are many very technically sound comments by those who are in opposition of RM-11769 proceeding any further, as I am. I will not belabor the technical aspects in this voice against RM-11769 other than to say I do agree with very many of the opposition comments on both technical and operational aspects that are presented.

My simple addition to this voice against such a misguided intent, in my opinion, will be the following.

1. There are CW only band segments in the VHF frequencies of 50.0 to 50.1 Mhz, and 144.0 to 144.1 Mhz. All of the other “CW only” segments of the Amateur Radio allocation are by license class.
2. An example of what a restructuring will do to the “CW only” segments, alluded to by the filer, as an example, already exist in the 40m band between 7.030 and 7.150 Mhz. At the present time, world wide, on this range of frequencies, all modes of transmission are allowed. The bedlam that occurs is terrible because of bandwidth issues related to each type of emission trying to operate beside another of a different type. I have heard RTTY, CW, Voice, Pactor, Automatic Amtor, Slow Scan Television, PSK, JT65, and beacon stations all at the same time in a span of 10 Khz. This is what I am afraid will happen if RM-11769 is allowed to progress.

Though I have only addressed two of many concerns, these two alone should invalidate the filer’s attempt to what would be tantamount to destroying the fragile band plan as it is now. If RM-11769 is allowed to become law it would fly in the face of countless hours

of time and monies spent by agencies like ITU, ARRL, and other national and international agencies that have attempted to balance the use of spectrum on a world wide basis - as much as can be at the present time. Since the United States has the largest amount of Amateur Radio operators in the world, wrongfully restructuring the "CW only" bands (which do not exist except in VHF), in my opinion, would create more world wide QRM and operational frustration than what already exists in the current band plans.

I respectfully request that the Federal Communications Commission / Wireless Telecommunications Bureau reject/deny RM-11769 from progressing and I ask that it be extinguished.

Sincerely

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