

## **Comments in Support of RM-11767**

On behalf of FlexRadio Systems, a pioneering leader in the design and development of software defined radios (SDRs) for the amateur radio market, We respectfully submit our support for the Petition of Expert Linears America, L.L.C. for the Commission to issue a Notice of Proposed Rulemaking to eliminate the 15 dB gain limitation on amplifiers that appears in 47 C.F.R. §97.317(a)(2).

Technological advancement since the original adoption of the restriction and the Commission's 2006 Order in WT Docket No. 04-140 has permitted the development of vastly more efficient and spectrally pure Amateur Radio transmitters, many of which are very small in size and generate lower output power, resulting in highly efficient, portable designs. Such efficient designs are excellent for emergency communication service, public service, and for remote or portable operations such as DXpeditions. However, due to the 15 dB limitation on amplification, a user of such new highly efficient transmitters limited to 50W or less fall short of legal limit operation without interim amplifier stages.

The relaxation of the 15 dB amplification restriction on RF amplifiers approved for use in The Amateur Radio Service encourages the Amateur Radio licensees to use the most efficient transmitters and encourage further development of the science and art of radio.

FlexRadio Systems respectfully requests the Commission to approve the Petition of Expert Linears America, L.L.C. to eliminate the maximum of 15 dB of amplification restriction while maintaining the restriction that such amplifiers may not permit amplification between 26-28 MHz.

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