

In the matter of **Proceeding RM-11869,**

‘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.’

To whom it may concern:

I oppose immediate approval of the proposal in proceeding RM-11769. I respectfully submit that there are negative implications that could result from these changes. These implications would have an impact detrimental to existing FCC Policy. Therefore more research on this issue is needed.

I have read many other comments on this issue. Not having seen some of my concerns addressed in other's comments or filings, I feel compelled to make my own submittal.

In summary:

- I believe the FCC wants to encourage amateur radio operator technical expertise. And also the expertise of understanding and being able to take advantage of RF propagation, both near and far. I believe this proposal will have the opposite impact on these two objectives.
- In addition I believe we don't have much factual information about the usage of, and trends in, CW operation. Before making changes, the usage and trends should be analyzed so changes can be made on a factual basis.
- There are several potential solutions to these concerns, but more facts need to be ascertained, and some of these would imply not just a shift in band usage, but a shift in how FCC policy (promotion of amateur radio skills) has been interpreted.

THEREFORE,

I respectfully suggest that careful research into the effects of the proposed changes should be conducted, and a decision deferred until such research is complete.

(continued)

Considerations:

1. Many emission types utilized by Amateur Radio operators have defined sub-bands. CW is a mode actively used. It deserves its sub-band just the same as other modes.
2. CW is often used for DX (international) communications. Amateur radio operators in other countries continue to use CW. Changing sub-band usages in FCC controlled areas may have an adverse impact on foreign users, or on domestic users interacting with foreign users via CW through resultant increase in interference and noise. Any changes made should be done so as to mitigate this impact.
3. Many of the amateur radio operators most interested in developing their technical proficiency start from CW. This is because the CW rigs are the simplest to understand and make, CW is the simplest emission mode, and the power efficiency of the emission mode dictates that exciting (to a radio operator) distances can be communicated across with little power. This also encourages a CW operator to develop an acute understanding of radio propagation techniques and antenna building.
4. If we lose the more easily achievable 'first steps' in hands-on radio operation (building a simple and inexpensive rig) due to loss of the dedicated sub-band, I anticipate that even fewer radio operators will desire to develop their technical proficiency in this area. This contradicts the FCC's stated objective for the amateur bands.

(continued)

5. This is because the proposed changes could well cause enough interference to CW mode radio operators to discourage them from developing core technical skills through building 'home-brew rigs', or understanding the intricacies of local and long-distance RF Propagation - technical skills I view as being part of the core amateur radio practice the FCC encourages. It is much more difficult to plan and build, say, a 'shift key' mode transmitter than a CW transmitter. It is also more difficult (and expensive) to build a higher power rig than a QRP (low power) rig. But with additional sub-band noise, a higher power rig might become required. With a decline in CW use, a more complicated rig to support a more complex emission type would be required. Thus I expect that fewer people would want to go to the effort, and cost, in their first attempt to build a rig. They would just buy one. Resulting in a net loss of the pool of knowledge that amateur radio operators currently hold.

6. Amateur radio operators are enjoined by the FCC to operate at the minimum required power. Many CW radio operators use low power (QRP or QRPp). These operators are often technically proficient in utilizing propagation to achieve remarkable communication results. This expertise is worth developing. This effort will be inhibited if CW bandwidth is shared, willy-nilly, with other emission modes.

7. Do we understand how CW band utilization is changing short or long-term? As with any emission mode, popularity changes over time. In my area and my circle of contacts, local and international, CW seems to be undergoing a renaissance. I was at a VE License Testing session with 30 people last weekend, many indicated they wanted to upgrade in particular to access more CW frequencies. This informal measurement indicates an increased awareness of and interest in CW.

8. Many operators who I consider to be the best operators, those that best represent Amateur Radio and practice those skills the best, as encouraged by the FCC, use CW periodically or regularly and test their radio operation proficiency.

(continued)

9. Many others suggest not approving this change. This may prove unduly restrictive to FCC goals. Others support the proposal as is, but I am concerned about the side-effects of such a change, and of policy implications. Indeed, while retaining CW sub-bands as-is may be the simplest way to address the concerns I have raised, it is not the only way. If the FCC feels it must make a change or changes regarding the CW sub-band, there are some other choices to be had:
- a. The FCC could consider creating mandatory sub-bands for low power (QRP) that would address many of these concerns. It could also consider finding ways to promote modes for which it is feasible for a beginner to build a 'home brew rig'. Or it could find ways to promote 'home brew rigs' being built. All of these, if achieved, could resolve the concerns I've raised, and align with the core FCC directive for the amateur radio bands: 'Good Amateur Practice'.
 - b. Another possibility might be to assign CW mode operation PRIMARY use in the sub-band, and other modes SECONDARY use. While this may sound good in theory, I believe that in practice the results would be poor for everyone concerned, as QRP CW users need a very clear frequency to hear a 2W (or 200mW) signal from overseas.
 - c. Due to the great use of CW by amateur radio operators internationally, it may also be advantageous to interact with the relevant agencies of other countries near FCC controlled spaces, or the ITU.
10. All of these options come with their own set of pros and cons. I don't think that there is a single, easy solution to the pitfalls raised by this proceeding's proposal. Therefore I recommend deferring action. Research is in order. When we have more information, a solution to what is basically a request for more bandwidth will likely present itself.

I hold myself ready for any questions you may have or any further input from me that you may require.

Sincerely,

(signed) Mackenzie A Brown

N5YDM

