

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of:)	
)	
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)	
)	RM-11769
)	
By: W. Lee McVey)	
)	
)	
To: The Chief, Wireless)	
Telecommunications Bureau)	
)	
_____)	

REPLY TO THE COMMENTS OF JAMES E. WHEDBEE

Comes now, W. Lee McVey, P.E. Ret., licensee of amateur radio station W6EM, and holder of General Radiotelephone lifetime license PG-12-19879; who wishes to file the following Reply to the Comments of James E. Whedbee in this Proceeding. Reply Commenter has been a Commission licensee in the Amateur Service since 1961, and a commercial radiotelephone licensee since 1965. These Reply Comments are filed in accordance with §1.405 of the Commission's rules.

1. Petitioner had promised us further detail as an Addendum or Errata filing, but nothing was forthcoming.¹ At least beyond what he called his Reply Comments filed May 13, 2016, during the Comment phase of this Proceeding. He made no mention of any existing or further constraint(s) affecting modes in renamed segments; and states that he is not “targeting” the CW mode.²

2. Wide-bandwidth, (2.8kHz or greater) automatically-controlled data stations are now restricted to defined, specific sub-bands;³ (or require that emission bandwidths not exceed 500 Hertz when not confined) and I could only assume from his absence of anything further that Mr. Whedbee’s intent was that automatic stations be *turned loose* to park anywhere and everywhere they desire within what he proposes to be named “symbol” segments..

3. The present codified restraints for data emissions now generally limit HF band symbol rate to 300 Baud below 28MHz and 1200 Baud at the 28MHz segment;⁴ and limit data bandwidth for automatic stations outside of automatic segments to not more than 500Hz⁵ should any wish to operate outside special segments intended for wide-bandwidth automatic stations. Modulation methods such as Orthogonal Frequency Division Multiplexing (OFDM) may allow greater symbol rates and still remain within their specified bandwidth, so there is need for clarification in the rules. Reasonable, peer-to-peer data emission bandwidth within existing 1.8-30MHz CW/RTTY/DATA allocations isn’t considered the 2.8kHz or greater bandwidth that Whedbee proposes it be.⁶ Keyboard modes only need bandwidths of several hundred Hertz or less. Due to the nature of OFDM, stations must be *precisely on the same carrier frequency to communicate, unlike other modes*. So, in order to effect the many additional station-to-station connections that Whedbee envisions using wide OFDM modes across entire “symbol” segments to

¹ Whedbee Petition at 43.

² Whedbee Comments at 2.

³ §97.221(b)

⁴ See §97.307(f)(3),(4)

⁵ §97.221 (c)(2).

⁶ Petition at 16.

“fatten” his assumed sparse utilization⁷, exact frequencies would need to be known ahead of time.

4. More practically, data emission bandwidths should be prescribed across existing CW/RTTY/DATA segments to be no greater than 1kHz, as is now the case for RTTY,⁸ except in special segments like the ones reserved for automatic stations. With an occupied bandwidth of typically 150Hz or less, well more than a dozen simultaneous CW or PSK data communications could occur within the width of *one* typical OFDM-based channel (2.4-2.8kHz). Allowing unrestricted wide data mode bandwidths across HF spectrum would be wasteful and block significant amounts of spectrum use by CW, RTTY and narrow keyboard data modes..

5. Since OFDM is frequently used to pass large, third-party traffic in the form of data files, its use deserves to remain *corralled* whenever it is used primarily for that purpose. The segment assignments of §97.221 for automatic stations should also be required for any stations passing traffic using OFDM-based digital data modes, except during declared emergencies.

6. Unlike RTTY, which uses two tones that can be easily and quickly tuned in, OFDM uses about 20 subcarriers, the spectral locations of which must all fall where expected. Not what could be considered an easy mode with which to make a general call to all stations (CQ). Placing all such wide-bandwidth data operations within the limits of §97.221 would facilitate their effective utilization.

7. By only addressing proposed bandwidth changes in his Petition, and nothing further, he presents us with what appears to be a *Trojan Horse* proposal that would encourage users of automatic, 2.8kHz and greater bandwidth OFDM data modes to literally fill up the amateur “symbol” segments with *auto-bot* automatic *Mailbox* operations. Not

⁷ Whedbee Comments at 3.

⁸ §97.307(f)(3)

practical, nor is it in the best interests of preservation of amateur radio and its codified purpose.

I ask that the Commission waive the time constraint on Replies to Petition Comments and accept my Reply, in spite of the fact that it has been longer than two weeks since Whedbee filed Comments on May 13. I waited until the statutory end of the Comment period since I was in anticipation of further Addenda from Mr. Whedbee.

Respectfully,

/s/

W. Lee McVey
3 Squires Glenn Lane
Leeds, AL 35094-4564
June 14, 2016

Certificate of Service

This is to Affirm, under penalty of Perjury, that I have served my Reply Comments on Mr. James E. Whedbee at his address of record in this Proceeding by placing a true copy of same in the United States Mail, First-Class postage-paid, this 14th day of June, 2016, in Leeds, AL.

/s/

W. Lee McVey