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February 17, 1999

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VIA HAND DELIVERY

Ms. Magalie Salas, Secretary
Federal Communications Commission
445 12th Street SW
Washington DC 20554

**Re: Amendment of Section 80.357 of the Commission's Rules to Conform to WRC-99
and To Promote the Use of Advanced Communications Technologies in the
Maritime Services**

Dear Ms. Salas:

Pursuant to Section 1.401 of the Commission's Rules, on behalf of Globe Wireless, Inc., I enclose for filing with the Commission the original and four copies of the above-referenced Petition for Rule Making.

Kindly date-stamp and return the extra copy of this cover letter.

If there are any questions about this filing, please call me at the number above.

Respectfully submitted,


Mitchell Lazarus

Enclosure

cc: Chairman William E. Kennard
Commissioner Harold Furchtgott-Roth
Commissioner Michael Powell
Commissioner Susan Ness
Commissioner Gloria Tristani
Thomas Sugrue, Chief
Wireless Telecommunications Bureau

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Before the
Federal Communications Commission
Washington DC 20554

In the Matter of)
)
Amendment of Section 80.357 of the)
Commission's Rules to Conform to WRC-99) RM- _____
and To Promote the Use of Advanced)
Communications Technologies in the)
Maritime Services)

PETITION FOR RULE MAKING

Pursuant to Section 1.401 of the Commission's Rules, Globe Wireless, Inc., through its attorneys hereby petitions the Commission to amend Section 80.357 of its Rules to conform in certain respects with the results of WRC-97, and to improve the spectrum efficiency of communications technologies in the Maritime Services.

Discussion

Section 80.357(a)(3) lists 744 frequencies in the HF band assignable to maritime stations for radiotelegraphy using A1A or J2A emissions.¹ The final "A" in these two designators means that transmissions are restricted to "Telegraphy — for aural reception,"² more commonly known as Morse code.

¹ 47 C.F.R. § 80.357(a). The frequencies range from 4187 through 25,162 kHz.

² 47 C.F.R. § 2.201(e)(2).

Morse code has fallen out of use, owing to the introduction of technologies that transmit information much more rapidly and reliably, and with far less operator training.³ The restriction to Morse code on these 744 frequencies results in extremely inefficient use.

WRC-97 responded to these developments by adding a new Footnote 6 to S52.54.1 of the ITU Radio Regulations that reads,

Additionally, use of classes J2B and J2D emissions are permitted on a non-interference basis to A1A Morse operations. However, these emissions shall not be used on the HF safety and distress frequencies listed in Appendix S15.⁴

Emission J2B is "Telegraphy — for automatic reception," typically radio-teletypewriter (RTTY).⁵ Emission J2D is "Data transmission, telemetry, telecommand."⁶ Both represent a substantial efficiency advantage over manual Morse code.

Request For Amendment

Both as a matter of international comity and to promote the use of these higher-speed communications technologies in scarce HF spectrum, the Commission is hereby requested to amend its Rules to implement the WRC-97 action described above. Specifically, the

³ For example, a Morse code speed of 20 wpm — the highest speed required for any amateur license, 47 C.F.R. § 97.503(a)(3) — is equivalent to a data rate of only 14 bits per second. By contrast, a telephone-grade voice channel with a modem can transmit data thousands of times faster.

⁴ The second sentence of this passage will have no effect on Commission regulations, because none of the HF safety and distress frequencies listed in Appendix S15 appear in Section 80.357(a)(3).

⁵ 47 C.F.R. § 2.201(e)(3). The J2 prefix represents single-channel, single-sideband, suppressed carrier operation.

⁶ 47 C.F.R. § 2.201(e)(5).

Commission is requested to amend the title and introductory paragraph to Section 80.357(a)(3) as follows. (Deleted material is struck out; added material is shown in double underline.)

§ 80.357 Morse code working frequencies. Working frequencies for Morse code and data transmission.

This section describes the working frequencies assignable to maritime stations for A1A and J2A radiotelegraphy. On the frequencies listed in paragraph (a)(3) of this section, emissions J2B and J2D are also permitted on a non-interference basis to Morse code operations.

Conclusion

For the reasons given, the Commission is respectfully requested to issue a Notice of Proposed Rule Making on the amendment described above. This proposed amendment will not disadvantage any user of the spectrum, and is in the public interest because it will promote greater spectrum efficiency.

Respectfully submitted,



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