

1. I have been a licensed radio amateur since 1955 and currently hold an Extra Class license with the call sign W2RS. I am an active operator in the VHF and UHF bands which would be affected by RM-9673, using both wideband and narrowband modes. I have had extensive experience in weak-signal operation including earth-moon-earth (EME), meteor scatter, auroral propagation and various other long-distance propagation modes and have published numerous technical articles about these in amateur radio journals.

2. I am writing to support the concept behind RM-9673, and =  
to urge the Commission to initiate a rulemaking proceeding in which the specific modes and frequencies involved may be considered.

3. I agree with the petitioner, CSVHFS, that wideband emissions such as FM, packet radio and spread spectrum are capable of causing extremely harmful interference to weak-signal communications using CW and SSB. Moreover, the nature of such wideband operation is such that the wideband operator is often unaware that there are any weak-signal activities on the frequency, since his receiving equipment is not capable of detecting them.

4. Regulations segregating different modes of emission =  
into specific sub-bands, to reduce the possibility of mutual interference, is as old as amateur radio regulation itself. In the United States, the earliest such regulations go back to the mid 1920s. Such regulations have survived for 75 years because they are generally seen to be necessary and effective.

5. In response to this petition, some will undoubtedly argue that the Commission should leave the matter entirely to amateur self-regulation. In this case, experience has already shown that self-regulation alone is not working and that specific regulations are required.

6. As I write this, wideband FM operation may be heard =  
on my receiver at several frequencies within the 144.1-144.3 MHz range, which is designated for CW and SSB emission in the American Radio Relay League (ARRL) band plan as published in ARRL's Repeater Directory. Evidently, these operators do not =  
choose to follow this plan.

7. As well-intentioned as the ARRL band plan is, it must be noted that less than one-third of amateur licensees in the United States actually belong to ARRL. Moreover, in the greater New York City area where I live, there is =  
currently no active amateur radio spectrum management organization, as the previously recognized regional frequency coordinator, TSARC, has been defunct in practice

for many years.

8. Were specific frequency limits on wideband emissions to be written into the Commission's Rules, I believe they would receive greater acceptance and compliance than do the current voluntary band plans. This is borne out by the far more widespread compliance with the Commission's CW sub-bands at 50.0-50.1 and 144.0-144.1 MHz. It has been a long time since I have heard a licensed U.S. amateur using unauthorized modes in these sub-bands. =

9. I thank the Commission for its consideration of this matter.

Respectfully submitted, =