

To whom it may concern,

I am commenting on proposal RM-9673.

First, I believe that the 2 m and 1.25 m sections of Appendix A of the proposal were intended to read as follows:

2 m	144.0-144.1	RTTY, Data	(4)
	144.1-144.3	Phone, Image	(1), (2)
	144.3-148.0	MCW, Phone, Image, RTTY	(2), (5)

and

1.25 m	222.0-222.15	Phone, Image, RTTY	(1), (2)
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Second, I believe that many of the individuals who have commented negatively on this proposal have not bothered to understand it. They seem to believe that the proposed change would "outlaw" AFSK and true FSK packet radio in the bands with which the proposal is concerned. This is not true. This type of emission would be allowed by standards/limitations (5) and (6) of Section 97.307(f). These paragraphs provides for unspecified digital codes of bandwidths less than 20 kHz and 100 kHz respectively. This is sufficient for packet in the following frequency ranges:

50.3 to 54 MHz (5) (20 kHz BW)  
144.3 to 148.0 MHz (5) (20 kHz BW) (If ammended as above)  
222.15 to 225.0 MHz (6) (100 kHz BW)  
420.0 to 431.8 MHz (6) (100 kHz BW)  
432.5 to 450.0 MHz (6) (100 kHz BW)

To my knowledge, there are few if any packet operations outside of these ranges.

I have been an active packet radio user in the past, and I work in digital communications as a profession, so I understand the politics and technical issues of packet radio.

I wholeheartedly support this proposal if amended as above.

Sincerely,  
Thomas C. Mayo, N1MU

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Tom Mayo - N1MU - [tmayo@adaptivebroadband.com](mailto:tmayo@adaptivebroadband.com)  
<http://www.adaptivebroadband.com/>  
Senior Development Engineer - Adaptive Broadband  
175 Science Parkway - Rochester, NY 14620  
716-242-8425 (Voice) - 716-241-5590 (Fax)