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Before the
Federal Communications Commission
Washington, DC 20554

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In the matter of:

Proposed changes to Part 97.305)	
of the Commission's Rules to limit)	
certain types of transmission)	RM-9673
on prescribed portions of the)	
Amateur VHF and UHF bands)	

Comments Offered by
Robert Brown, N7STU

Introduction

I have been a licensed radio amateur since 1991, holding the callsign N7STU. Since 1994 I have been primarily active in the weak signal areas on all of the VHF/UHF bands between 50 MHz and and 1300 MHz and am currently building equipment for the 5.7 GHz and 10 GHz bands. I am primarily a DXer and enjoy making beyond line of sight contacts on VHF/UHF using tropospheric ducting, meteor scatter and some EME (moonbounce), etc. SSB, CW, and HSCW (high speed CW at 500 WPM) are what I have employed as the most effective modes to accomplish the desired communications. I am an Area Representative (and charter member) of the Western States Weak Signal Society.

Discussion

The CSVHFS has filed a petition with the Commission proposing Rule changes that would protect long haul weak signal work on the bands above 50 MHz. In that

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petition, they express concern that such operation, vital to the continued contributions amateurs are making to the state of the radio communications art, are in jeopardy because of increasing encroachment by various kinds of wide band modes such as FM voice and packet into the small portions of the bands where weak signal work customarily takes place.

On June 28, 1999 the Commission designated the CSVHFS filing the above RM Number.

I wish, to lend my support to the CSVHFS filing and the Commission's RM. I firmly believe that the Rules changes desired by CSVHFS are in the best long term interest of Amateur Radio. I contend that the threat CSVHFS cites is very real and does have the potential to severely limit, or, eliminate altogether, the valuable long haul / weak signal work taking place on the bands above 50 MHz. During my operations on 2m and 1.25m I have frequently experienced interference from FM stations operating in the area set aside by gentlemen's agreement for SSB/CW operation. This has been noted on other bands also but not as frequently, due to my rural location.

It is often difficult/impossible to ask the offending parties to move for the following reasons:

Many of us are using HF rigs with transverters and as such are unable to transmit in the FM mode on the VHF bands.

A signal which may be strong enough to cause interference when detected in a sensitive, narrow band receiver, is too weak to establish an FM contact.

If communication can be established with the FM station, they are often not co-operative in moving to a more appropriate part of the band. Frequently they claim that the FCC rules don't prohibit them from operating there.

I have learned, however, that the Appendix accompanying the CSVHFS filing contains several errors which have been interpreted by some as an attempt, on

the part of CSVHFS, to eliminate, altogether, various digital and test modes presently permitted on the bands above 50 MHz. A reading of the body of the petition is sufficient to demonstrate that this was not the intention of the filing. The errors cited, apparently resulted only from a failure to accurately copy the various presently permitted modes from the Commission's Rules into the Appendix. I understand that the CSVHFS is asking only that wide band modes be prohibited only from 50.0 - 50.3 MHz, 144.0 - 144.3 MHz, 222.0 - 222.15 MHz and 431.8 - 432.5 MHz. At this time I do not support any changes to the allowable modes on frequencies outside of those designated above.

I note that such wide band modes have been prohibited on all of the HF bands below 29 MHz for many years. Thus, I conclude, there is precedent for restricting them as well from these very narrow segments of the 6 meter, 2 meter, 1.25 meter and 70 cm bands.

It can be expected that the Commission will receive comments opposing this RM from people and organizations not understanding the intent of the CSVHFS filing. Most of such opposition comments will, no doubt, result from a reading of the Appendix and mistaking the errors in it for an attempt on the part of CSVHFS to completely eliminate certain modes from the bands above 50 MHz. I trust that the Commission will conclude that any such comments are based on an incorrect interpretation of what CSVHFS was seeking in its filing, and treat them accordingly.

I ask the Commission to act promptly and positively on this matter and change the Amateur Service Rules as requested by the CSVHFS. I am confident, that the Commission will overlook the obvious errors contained in the Appendix accompanying the CSVHFS filing and institute Rules based on the CSVHFS's actual intent as reflected in the body of their filing.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Robert Brown', is written over a horizontal line.

Robert Brown, N7STU

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7/22/99