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18 July 1999

Before the

Federal Communications Commission

Washington, DC 20554

In the matter of:

RM-9673

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

Comments Offered by John Butrovich III, W5UWB

Introduction

I have been a licensed radio amateur continuously since February 1949, receiving the Class "B" call letters KL7WR at that time. Later changed to W6GTJ in late 1949 and in 1950 upgraded to the highest class available, the Class "A". During the 50 years licensed, I have concentrated my efforts mainly to the study and practice of various propagation modes on the amateur bands above 50Mhz. These modes would include Sporadic "E", F-2 layer, Meteor scatter, Aurora, FAI (Field Aligned Irregularities), Tropospheric ducting and EME (Earth-Moon-Earth). I presently hold one end of the overland, Tropo distance record on 222Mhz and have worked all states on 144Mhz using various propagation modes.

Discussion

The Central States VHF Society (CSVHFS) has filed a petition with the Commission proposing Rule changes that would protect weak signal work on bands above 50Mhz. In that petition, they express concern that weak signal operation, vital to contribution by amateurs to the state of radio communications, is being hampered by the encroachment of various types of wide band modes. These Modes, such as Frequency Modulated (FM) voice and Packet are moving into the very small portions of the bands where weak signal work customarily takes place.

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On June 28, 1999 the Commission designated the CHVHFS filing the above RM number.

I wish to lend my support to the CSVHFS filing and the Commission's RM. I believe that the changes proposed by the CSVHFS are in the best interests of Amateur Radio, now and in the future. The threats stated by the CSVHFS are real, and could severely limit the long haul / weak signal work and experimentation now taking place on those bands above 50Mhz.

It should be noted, that the appendix accompanying the CSVHFS filing contains several errors which has been interpreted by others as an attempt to eliminate various digital and test modes permitted on the bands above 50Mhz. A careful reading of the petition will reveal that this was not and is not the intent. I know that the CSVHFS is asking only that *wide band* modes be prohibited from 50.0 – 50.3 Mhz, 144.0 – 144.3 Mhz, 222.0 – 222.15 Mhz and 431.8 – 432.5 Mhz. I do NOT favor any overall restrictions on these modes outside these noted band segments.

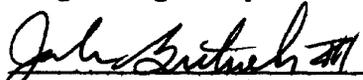
It should be noted that wide band modes have been prohibited on the High Frequency (HF) bands below 29 Mhz for quite some time. Thus I believe there is precedence for restricting them from these narrow segments of the 6 meter, 2 meter, 1-1/4 meter and 70 cm bands.

I expect the Commission will receive many comments opposing this RM from people and organizations not understanding the intent of the CSVHFS filing. This understanding will be a result of the errors on the copying of the Appendix to the filing, and lead one to erroneously conclude that the CSVHFS are trying to eliminate certain modes completely on bands above 50 Mhz. I hope the Commission will conclude that any opposing comments are based on an incorrect interpretation of the CSVHFS filing.

I ask the Commission to act promptly and favorably on this matter and change the Amateur Service Rules as requested by the CSVHFS. In so doing, the Commission should overlook the obvious errors contained in the CSVHFS filing's Appendix and institute Rules based on the CSVHFS actual intent as reflected in the body of its filing.

Respectfully submitted.

Original signed by


John Butrovich III WSUWB