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Before the
Federal Communications Commission
Washington, DC 20054

Petition for Rulemaking

Request to change Part 97.305)
Of the Commission's Rules to expand)
Certain types of transmission)
On prescribed portions of the)
Amateur VHF bands)

Petition Submitted by the
California Six Meter Club

Introduction

We propose expanding modes that can be used in the first 100 kHz of the six and two meter Amateur Radio bands, to include the transmission of all digital modes up to 300 baud rate as well as single side band phone. This will facilitate easier radio spectrum management by the Amateur Radio community and protect weak signal VHF operation from wide band FM encroachment. Our proposal does not restrict or eliminate any present Amateur Radio band uses. It only expands modes that every radio amateur can use on the first 100 kHz of six and two meters.

A brief history

March 1, 1946, 50 MHz – 54 MHz and 144 MHz – 148 MHz was released by the Commission for Amateur Radio occupancy, phone modes were allowed across all four MHz of six and two meters. In response to a petition filed by the American Radio Relay League and others, effective June 6, 1960, the Commission amended Section 12.111 of the Amateur Radio Rules to provide that only A1 emission (CW) may be used in the lower 100 kHz of the 50 and 144 MHz Amateur Radio bands. It was believed at that time that this would promote Amateur experimentation with weak signal techniques. Alas, this did not happen, improvements in weak signal techniques took place in the very modes that were excluded (SSB phone and RTTY).

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Discussion

We have completed a survey of CW weak signal operations by our members and others using CW on six and two meters. It shows that 93 percent of the time CW contacts are made in the SSB phone portion of the two bands, leaving the first 100 kHz virtually unused. This practice also shows there is no compatibility problems with CW and SSB phone using the same spectrum area.

Proposal

In order to rectify the execution of modern weak signal modes from the lower 100 kHz of 50 and 144 MHz Amateur Radio bands, we request a rule change to provide SSB phone and all digital modes up to 300 baud may be used on the lower 100 kHz of the 50 and 144 MHz Amateur Radio bands.

Respectfully submitted,



Robert Hastings, K6PHE
President of the California Six Meter Club

The specific rule changes requested by CSMC are:

Section 97.305

Wavelength band frequencies emission type authorized standard

6 meters 50.0 – 50.1 MHz RTTY, data, phone, image (1), (2), (3)

2 meters 144.0 – 144.1 MHz RTTY, data, phone, image (1), (2), (3)

No changes are proposed for frequency segments not listed.

(1) No angle modulation emission may have a modulation index greater than one.

- (2) No non-phone emission shall exceed the bandwidth of a communications quality phone emission of the same modulation type. The total bandwidth of an independent sideband emission or multiplexed image and phone emission shall not exceed that of a communications quality A3B emission.
- (3) Only RTTY or data emissions using a specified digital code listed in Section 97.309(a) of this part may be transmitted. The symbol rate must not exceed 300 baud, or for frequency shift keying, the frequency shift between mark and space must not exceed 1 kHz.