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Federal Communications Commission

March 9, 2000

Before the
Federal Communications Commission
Washington, D.C.20554

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In the Matter of RM-

Petition for Amendment of)
The Commission's Rules to)
Establish New Band Plan)
Authorization in the Amateur)
Service)

Executive Summary

- Whereas the Amateur Radio Bands have historically had large portions of the radio spectrum reserved for and devoted to the CW mode of communications and whereas this mode of communication is archaic and abandoned by all Federal Agencies except the Amateur Service the Commission can no longer justify the broad reservations of the radio spectrum for CW only.
- A study of the following chart will show that the CW reservation is totally unjustified and that the phone bands are proportionally disadvantaged.

<u>Frequency</u>	<u>Spectrum Reserved For CW</u>	<u>Percentage of Band CW Only</u>	<u>Total Available Freq. Per Band</u>
23 CM	N/A	N/A	N/A
33 CM	N/A	N/A	N/A
70 CM	N/A	N/A	N/A
1.25 Meters	N/A	N/A	N/A
2 Meters	N/A	N/A	N/A
10 Meters	300 KHz	17.7 %	1.7 MHz
12 Meters	40 KHz	40 %	100 KHz
15 Meters	200 KHz	44 %	450 KHz
17 Meters	42Khz	42%	100Khz

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Commission's Rules to Establish
New Band Plan Authorization
In the Amateur Service**

20 Meters	150 KHz	42.8%	350KHz
30 Meters	50 KHz	100 %	50 KHz
40 Meters	150 KHz	50 %	300 KHz
75/80 Meters	250 KHz	50 %	500 KHz
160 Meters	200 KHz	100 %	200 KHz

Recommendation

- 3. As can be seen from the above chart the CW reservations are abundantly generous and due to advances in radio communications and license upgrades phone band crowding cannot be justified any longer.**
- 4. A more realistic approach to band usage and CW reservation would be:**

<u>Frequency</u>	<u>Spectrum Reserved For CW</u>	<u>Percentage of Band CW Only</u>
23cm	no change	n/a
33cm	no change	n/a
70cm	no change	n/a
1.25meters	no change	n/a
2 meters	no change	n/a
10 meters	28.000 to 28225	13%
12 meters	24.890 to 24.910	20 %
15 meters	21.000 to 21.100	22%
17 meters	18.068 to 18.100	42%

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20 meters	14.000 to 14.100	28 %
30 meters	10.100 to 10.150	100%
40 meters	7.000 to 7.050	17%
80 meters	3.500 to 3.600	20 %
160 meters	1.800 to 1.820	10 %

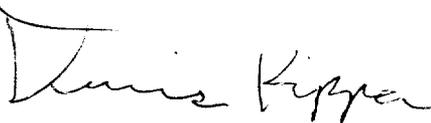
5. This change of the CW only bandwidth will help to alleviate the chaotic overcrowding on the voice portions of the amateur bands. This is especially true of the 80, 40, and 20-meter bands.

6. It is expected that a large percentage of amateur radio operators will and are upgrading to higher-class licenses and to more phone privileges. A larger phone spectrum is needed to accommodate the expected increase in activity.

7. The Commissioners' prompt attention to this matter will be much appreciated by the amateur radio community.

Respectfully,

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