

Before the Federal Communications Commission  
Washington DC 20554

In the Matter of: Ammendment of the Commission's Rules to  
Permit Broader Data Transmission Capabilities RM - 10051

Comments of Nickolaus E. Leggett

I am an amateur radio operator (call sign N3NL) with  
over 30 years of experience.

This proposed change in the Part 15 rules for the 420 - 450  
MHz band would greatly increase interference to amateur radio  
operation. Amateur radio often operates in a weak signal  
environment where long distance communication is being  
accomplished with low power. This weak signal communication  
includes long terrestrial paths and Earth-Moon-Earth moonbounce  
communications experiments. These experiments would be greatly  
impacted by the proposed new high power and high duty cycle Part 15  
devices.

The Federal Communications Commission should deny this  
petition and all other petitions that would increase the power and  
or duty cycle of Part 15 devices. Then independent engineering  
studies should be conducted under Commission supervision to  
determine the impact of all proposed Part 15 technologies on  
licensed communications services including amateur radio. These  
studies should focus on the impacts to weak signal communications  
activity. In addition, these engineering studies should  
examine the impact