

The following is a retransmission of the comments originally submitted on March 7, 2001 by Nickolaus E. Leggett. The original comments were accidentally cut off by the electronic filing system.

Before the Federal Communications Commission  
Washington, DC 20554

In the Matter of: Amendment 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 of the Proposed Part 15 technologies on radio astronomy research. Radio astronomy is the ultimate weak signal activity and it is highly vulnerable to interference.

Respectfully submitted,  
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