

7 February 2002

Federal Communications Commission
Office of the Secretary
Washington, D.C. 20554

Re: In the Matter of RM-10352

Gentlemen:

This is a brief reply to an argument submitted in the comments of several of the Amateurs submitting comments in opposition to RM-10352.

Several comments have stated that the allocation by regulation of a 43 KHz portion of the band exclusively to CW and other narrow-band modes is in some way "unfair" to SSB and AM users of the band, by requiring them to restrict themselves to the remaining 157 KHz.

Inherent in such comments to the Commission is the intent of the commenter to use the portion of the band below 1.843 MHz for wideband-mode operation, in contravention of the voluntary band plan. The voluntary ARRL band plan already restricts wideband operation to the upper 157 KHz of the band. As the voluntary band plan does not have force of law, they feel unconstrained by its requirements. This is what they are arguing that the Commission should continue.

This further demonstrates the need for mode segmentation in regulation rather than by voluntary band plan.

I urge adoption of RM -10352.

Best Regards,

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