

RE: RM-10413 – Request for refarming of Novice Subbands

To Whom It May Concern:

I am in opposition to RM-10413. When the FCC originally refused to act on the ARRL's request, the FCC commented:

“We believe that in light of ongoing discussions concerning implementation of new and more modern communications technologies within the amateur service community, we should accord the amateur service community an opportunity to complete such discussions and possibly reach a consensus regarding implementation of new technologies before we undertake a comprehensive restructuring of the amateur service operating privileges and frequencies.”

I would argue that the ARRL is revisiting this matter, even though the circumstances surrounding the issue has not changed. A consensus has not been reached--4,700 respondents out of an amateur population of 700,000 do not constitute a consensus by any stretch of the imagination. By its' own admission in the Notice (*italics added by the author for emphasis*):

“While the survey results *did not reflect consensus* on any one HF band configuration, *consensus was not anticipated by the Committee*. The survey listed *some* alternative configurations for narrowband and wideband segments in the 80-meter, 40-meter, 15-meter and 10-meter HF allocations. It would have been impractical to attempt an exhaustive list of all possible permutations or adjustments in the HF bands. Had that been attempted, the results of the survey would have been diluted to an unacceptable extent. The Committee's proposals instead *sought to determine tendencies and trends* among those responding *rather than to seek input on the many possible options* for separating wideband and narrowband emissions in each band.”

The FCC has clearly stated that before rulemaking on the issue will proceed, consensus should be reached. By the ARRL's own admission, it did not look for a consensus and therefore, has not found consensus.

The FCC has also clearly indicated any rulemaking proceeding hopefully would address the issue of modern technology in this Notice of Rulemaking. The ARRL has substantially ignored modern technology, instead choosing to grant more valuable spectrum to telephony in the ruse of spectrum overcrowding.

In fact, the amateur population in the United States continues to decline, and will do so for the foreseeable future. This will lessen the demand for spectrum. Plus, solar conditions for the last few years have meant that the bands have seemed to be more crowded than usual. As solar conditions change, the congestion will lessen. Couple these two factors together, and it can be seen the overcrowding situation is temporary and very possibly illusory in nature.

In light of the above, I would support two possible outcomes to RM-10413. The “refarming” request should be denied and the other matters included approved, or the FCC should exert a leadership role where none exists and set aside the entire Novice spectrum for exclusive use by low-power, narrow bandwidth experimental modes for all license classes. It is time for someone to propel amateur radio forward, rather than reward its moribund past.

Respectfully,
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