Gentlemen:

I support RM-10413 and recommend its adoption for the following reasons:

1) The approach recommended by the ARRL for Novice Refarming is reasonable and will, most likely, satisfy the vast majority of amateurs.

2) IT RETAINS A SEPARATION OF WIDEBAND and NARROWBAND MODES BY AN ACT OF FCC COMMUNICATIONS LAW as one its most important tenets which will serve to maintain relative order in the two principal segments on each band to be restructured. Such a separation of modes by band-segment is absolutely necessary in order to prevent interference among mode/bandwidth types and will promote an orderly growth in the future of digital modes within protected, narrowmode regions.

Some might argue that the lines of demarcation between wideband and narrowband modes be drawn somewhat differently but it appears to me that what the ARRL is recommending will allow sufficient space for CW and other digital modes to continue to exist in relative harmony absent wideband interference over time.

3) It is respectfully requested that the Commission incorporate the recommendations of RM-10352 into its overall NPRM for Novice Refarming in order to ensure that the benefits of a separation of wideband and narrowband modes, by an act of Communication Law, accrue to amateur users of the 160M (1.8Mhz)band as well.

If the Commission believes there is a BENEFIT to mode/bandwidth separation on the bands to be realigned due to Novice Refarming, then now is the time for these very same benefits to be applied to 1.8Mhz as well.

In this case, wideband modes should be restricted to 1843kHz and above in order to provide an orderly growth of digital modes in the region 1800-1843 kHz absent wideband mode interference.

Thank you for the opportunity to comment. I am hopeful that the Commission will marry the benefits of RM-10413 and RM-10352 into its NPRM that may be forthcoming with respect to Novice Refarming.

Very truly yours,
Jeffrey T. Briggs, K1ZM