

BACKGROUND: I have been an amateur radio operator since 1968 and currently hold the Amateur Extra Class license with the callsign K2PG. My station is predominately active on the MF and HF bands. I am not affiliated with the Petitioner, the American Radio Relay League, Inc. (ARRL).

COMMENTS: I would like to address three areas discussed in this Petition for Rulemaking, RM-10413, as follows:

1. Emission subbands.

The Petitioner, while addressing the question of what to do with HF spectrum currently available to Novice and Technician Plus licensees, insists on preserving the antiquated system of reserving subbands for voice and nonvoice transmission. The United States is one of the few countries in the world that still sets up emission subbands by government fiat. In most other countries, including Canada, there are no government-mandated emission subbands. Amateur radio operators in those countries (even including Communist Cuba!) use "gentlemen's agreements" to determine the type of emission they use in various segments of amateur radio frequency bands. While activity is declining on the nonvoice subbands, especially on the 80 meter band, the U.S. voice subbands are horribly overcrowded. This mode segregation by government fiat fails to allow for changes in operating tastes and techniques. On most of the HF bands, it also has the undesirable effect of creating "American-free" zones, where amateur radio stations in the rest of the world may transmit voice, but American stations may not. The net effect is that optimum usage of prime segments of our HF bands are denied to U.S. amateur radio stations, regardless of operator license class. The worst situation exists on the 40 meter band (7000-7300 kHz), in which U.S. amateurs located in the 48 contiguous states are the only amateurs in the world who are not permitted to use voice communications below 7100 kHz. The frequencies above 7100 kHz are rendered useless for amateur communications at night due to interference from high power international broadcast stations. Rather than increasing the size of the voice subbands (by a pitiful 25 kHz, in the case of the 80 meter band, as proposed by the ARRL), Section 97.305 of the Rules should be simplified and the emission subbands should be deleted on all amateur bands. The only restriction that should remain is for nonvoice modes only on the 30 meter band (10.100-10.150 MHz, not the subject of RM-10413).

2. Advanced Class subbands.

While the Petitioner proposes to phase out Novice and Technician Plus subbands, RM-10413 continues to allow for Advanced Class subbands, even though the Advanced Class license is no longer issued by the Commission. Since the Advanced Class license is being phased out, its subbands should be dissolved and the same operating privileges should be afforded to General and Advanced Class licensees, in much the same way as the Commission opened the old Class A voice privileges to General Class licensees (formerly Class B) in 1952. There is still some incentive for existing Advanced Class licensees to upgrade their licenses and operating privileges to Extra Class. Since the Advanced Class license is being phased out, phase it out, period.

3. Power restrictions.

Currently, a power limit of 200 watts PEP exists in the Novice/Technician Plus subbands. This power limit applies to all amateur radio stations operating in those subbands, regardless of the license class of the operator. I concur with the Petitioner that these power restrictions should be

lifted for holders of the General, Advanced, and Extra Class licenses and that existing Novice and Technician Plus licensees should continue to be restricted to 200 watts PEP while operating on any frequency below 50 MHz.

Respectfully submitted,
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