

Regarding the ARRL proposal to reform the Novice subbands, I offer the following comments:

1. I SUPPORT General Class CW privileges to Novice and Technician-Plus licensees in the digital subbands of 80, 40 , 15, and 10 meters.

2. I OPPOSE realigning the upper boundary of the digital subbands at this time. In just the least two years, the Amateur Radio Service has seen an explosion of new digital modes and there has been a Renaissance of experimentation in these modes. It is too early to consider realigning the boundary between the wider, analogue modes and digital modes when there is a digital revolution upon us. It is very likely that the those operating digital modes will find crowded conditions in the next 5 to 10 years if their subband is reduced now.

3. I RECOMMEND that on 80, 40, 15, and 10 meters, the Novices and Technician Plus licensees be allowed to operate all the narrow-band digital modes that are available to General Class licensees. Just as entry level licenses focussed on developing CW skills in the past, the new goal should be to encourage newcomers to operate in the digital modes. That will help promote Amateur Radio as a "fundamentally technical" service (as stated in the FCC's December 1999 Report and Order on Restructuring). I wholeheartedly agree with the Commission on that characterization, and hope to see the Commission continue to act on that vision for the Amateur Service.

4. I RECOMMEND that the power limit for Novice and Technician operators remain at 200 watts.

Sincerely,

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