

In a filing dated 5/31/02, William Tippett argues that lodging sole authority for allocating HF privileges in voluntary arrangements developed by the radio amateur community (read ARRL), as is now done on 160 meters, and based on that experience, would do more harm than good and would tend to make matters worse in the use (and abuse) of the HF amateur spectrums. Having taken the opposite view in an earlier comment with the FCC--in favor of substantial deregulation--I now find Mr. Tippett's arguments persuasive.

Being a newly-returned radio amateur, I have been unpleasantly surprised at the bad behavior of some hams on the HF bands and now realize that it would take only a relatively few bad apples to disrupt amateur radio HF operations--IF many details of HF privileges were left up to voluntary arrangements. The ARRL and Mr. Riley Hollingsworth would no doubt have their hands full, and the outcome could be exceedingly unpleasant, even with their interventions. Moreover, given the high state of alert that now exists for homeland security purposes, there is no room now for allowing greater latitude for errant behavior on the amateur bands at a time when radio amateur operations have been, and may be, directly related to critical national security activities. So I now believe the FCC should retain its traditional rule-making authority regarding radio amateur spectrum and privileges, because this authority has the force of law behind it.

Finally, I agree with a comment attributed to Mr. William Cross of the FCC in a speech at the May 2002 Dayton Hamvention in which he reportedly warned about "unintended consequences" of what we hams may be recommending. I therefore withdraw my previous comment/recommendation regarding deregulation, posted with regard to RM-10413, and apologize for any inconvenience this late filing may cause.