

I believe the proposal presented in RM-10807 is harmful to the interests of the Amateur Radio Service and for the effective and efficient use of limited available HF spectrum. Therefore, I strongly oppose it. The basic problem with this proposal is that it would be costly, complicated and unmanageable in practice. Furthermore, it doesn't directly address the issues of ensuring and promoting efficient use of band segments by rationing thier access to only qualified operators as evidenced by passing skill tests in competence areas. This proposal lets a test of skill in one area substitute for lack of completely unrelated skill in another. In reality this substitution won't transfer in terms of real use of the HF amateur bands.

Sincerely,  
James Knight, W2JLK