

NPRM 04-140 is a good first start, insofar as expanding phone privileges on the HF bands is concerned; however, it does not nearly go far enough to resolve the underlying problem.

There is not nearly enough HF spectrum for phone use while spectrum reserved for CW/digital modes is vastly underutilized. The former Novice bands are a prime example: seldom can one ever find more than one or two occupants of either the 3700-3750 KHz or 7100-7150 KHz CW bands. Overcrowding of the phone bands, particularly on 75 meters, causes incivility, harassment, jamming, and all the attendant problems resulting in multiple complaints to the Commission for violations both real and perceived.

I would point out that CW emissions are permitted in ALL portions of the HF bands save the 5 MHz channels. CW operators are free to, within their license limits, scour the entire band for a clear frequency while phone operators (despite having wider bandwidth signals) are limited to a half (or less) of the band. CW operators can also easily avail themselves of sharp receiver filters to limit interference while phone operators cannot easily increase receiver selectivity without negative impact on intelligibility.

The 75 meter phone band suffers from one station broadcasting the same material for hours on end on 3890 KHz and 3977 KHz. This station disrupts existing conversations by exhibiting a continuing failure to listen for activity before transmitting and continues to monopolize at least 10 KHz of scarce bandwidth in the crowded 75 meter phone band. The Commission is either unable or unwilling to resolve this long-standing problem. Finally, the 40-meter phone band is shared with international broadcasting and is almost useless during the night time hours while the CW portion of 40 meters is relatively unaffected.

Expansion of the HF phone bands would, I firmly believe, markedly decrease the number of complaints to the Commission, would decidedly increase the civility and camaraderie on the phone bands, re-utilize virtually empty CW bands, and more fairly allocate bandwidth based upon bandwidth requirements and usage while having a negligible impact on existing CW/digital operations.

Thank you for your consideration.

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