

With the exception of its specific bandplan on 7 MHz, I support the ARRL's proposal to re-segment the Amateur Radio bands by emission bandwidth rather than emission mode. The reasoning and philosophy behind this is quite sound, with two caveats.

with regard the 7-7.3 MHz band, the ARRL has broken its own pattern in assigning bandwidth (BW) on other bands, and suggested a reduction in the narrow-bandwidth (typically, the A1 emission) segment that doesn't take into account the current activity levels on that band, which is very heavily used day and night for telegraphy. In fact, the telegraphy subband is already suffering from severe congestion from European radioteletype and Central American telephony, and opening that segment to further intrusion by digital modes would be a serious mistake. Furthermore, the proposed allocation of 7.000-7.035 MHz would leave only 10 KHz for radiotelegraphy operation by non-Extra Class licensees, where they currently enjoy 125 KHz. This is a radically reduced, even punitive allocation for the second-most popular mode on the HF bands. Still, there is no doubt that digital modes need more allocation. As a compromise, and consistent with the proposed re-segmentation on other bands, I would suggest the 200 Hz BW segment be allocated at 7.000-7.065 MHz, the 500 Hz BW segment be allocated at 7.065 - 7.115 MHz, and the 3.5 KHz BW segment at 7.115 - 7.300 MHz.

Secondly, the FCC should consider the possible harmful effect of automated digital communications - those communications which do not require a control operator to be present. We consider this harmful because automated station operations cannot ascertain conclusively whether a frequency is clear of conflicting communications, particularly in weak signal operations, and will almost certainly result in in-band interference. We strongly recommend (as part of the implementation of this proposal), that automated digital communications be specifically prohibited, or that they be limited by regulation to a very narrow band segment, perhaps 5-10 KHz wide, per band. I would suggest that this should apply to all bands below 30 MHz, and to any 500 Hz BW segment below 220 MHz.

Lastly, allow me to caution the FCC \*not\* to consider completely

deregulating the bands (as regards emission bandwidth), as has been done in some European countries. In monitoring communications and text messaging on the internet, I have observed that a great number of conflicts have arisen in the application of voluntary bandplanning there, particularly during peak activity, such as communication "contests", resulting in the situation where narrowband modes can be completely eliminated from using the band. At best, such would be annoying and unfair to narrowband operators, and at worst potentially disastrous to emergency communications. Further, I find that our culture does not support such voluntary compliance, as a small but sizeable segment of fiercely independent-minded operators take it as a personal affront to comply with bandplans created by organizations such as the ARRL. In short, we heartily recommend that US band allocations (including the emissions bandwidth) be defined by regulation, and not rely on voluntary compliance.

In summary, given the caveats and caution referenced above, we endorse the ARRL proposal.

Thank you for your diligent consideration.

regards,

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