

As I read each of the two documents, that is, NPRM-11305 and NPRM-11306 I notice several similarities between the two, obvious omission of a well thought out bandplan on the one submitted by the ARRL and not enough thought on the part of the opposing document. Therefore, knowing that simplicity sometimes is the best for all concerned and with no pecuniary interest in the advancement of any technology let me outline what I feel would be a more stable method of approaching this dilemma facing all of us at this time. I strongly oppose the ARRL plan as it goes against its members wishes and seems to be written to allow WINLINK and other such modes to wipe out the bands. The also are recommending a slimming down of certain frequencies that have been historically available for CW.

Whereas, the many modes and methods of communications continues to evolve and knowing that the spectrum allocated remains static and certain portions of several bands remains mostly underutilized I hereby propose the following.

The current maximum width of emissions currently in use in the Amateur service is actually sufficient unless the future goal is E Mail over the air on HF Amateur Bands. I believe that there is already existing a system throughout the world designed to convey such messages already in place. Eating up valuable HF bandwidth to move traffic faster is ridiculous and with error correction needed due to fading, earth and atmospheric noises no real speed would be gained with the increased bandwidth necessary for this type of use.

The overall goal of most radio amateurs throughout world are communications with others and radio communication and experimentation as well as being ever ready to assist others with our communications skills during periods of strife and emergency.. We are one world and with radio signals traveling over the borders of other nations we must be ever vigilant to prevent conflict or interference with others modes authorized other nations amateurs.

My proposal is simple yet still complex enough to need the approval of the FCC. Whether or not Morse code is to be retained or eliminated will not affect the thought process of this proposal. The major change will be in the actual frequencies used for the digital modes and the addition of privileges for the Technician licensee for several of these modes. In no case or instance does this proposal address or recommend voice privileges for Technician and/or Novice class licensee's on the HF bands, but more so give some limited experience with new modes.

For the MF band of 160 Meters – the current allocation is working and should remain as such.

For the 80 Meter band, allow Technician and Novice licensee's the use of their portion of the band to use PSK in addition to CW not to exceed 200 Hz signal width.

For the 60 Meter band, we petition the FCC for additional frequencies on a non-interfering basis with the primary. The bandwidth shall remain at a maximum of 2.8 KHz. The frequencies should be reserved for General Class license and above.

For the 40 Meter band, allow the Technician and Novice licensee's the use of their portion of the band to use PSK in addition to CW not to exceed 200 Hz.

For the 20 and 17 Meter bands – the current allocation is working and should remain as such. These bands should continue to be reserved for the General class of license and above.

For the 15 Meter band, allow the Technician and Novice licensee's the use of their portion of the band to use PSK in addition to CW not to exceed 200 Hz signal width.

The 10 Meter band is well thought out and we would petition for the addition of PSK in the Novice bands.

In no case shall the expansion of the Novice, Technician or Technician plus licensee's utilize a power greater than 25 watts with this mode.

I respectfully request the FCC to continue to manage the bands by Mode and not by bandwidth.

No changes are recommended for the 6 meter, 2 meter, 1.25 meter, 70 centimeter, and the other UHF bands.