

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of ) RM-11305  
Amendment of Part 97 of the Commission's ) RM-11306  
Rules To Implement the Basis for Bandwidth)  
Based Bandplanning )

Via the ECFS  
**Charles L. Young (AG4YO)**

**RM-11305 (CTT) Petition**

1. I bring to the attention of the Commission that the CTT plan relies completely on the goodwill of amateurs for vastly different modes to co-exist. The following quotes represent comments made concerning the Region 1 bandplan during official proceedings which show that this trust is misplaced:

*From the USKA Society, Switzerland, Paper Number 31: "With a 3-year experience the actual HF bandplan (decided in San Marino 2002) does neither fulfill the needs of the users nor is respected by them. The definition of band-width is not well-ried because mainly on 10, 14, and 21Mhz the recommendations of the IARU Region are often not respected."*

*From the RSGB, Improving Bandplan Compliance, paper number 138: "An increasing proportion of the Amateur Radio community is using non-CW modes and deploying beacons within the CW communication sub-bands. National societies could do more to improve compliance with IARU bandplans. Note: The authors believe that the degree of compliance within the CW sub-bands in particular is indicative of the respect for IARU bandplans in general. The IARU Region 1 HF Bandplan has served the amateur community very well for many years, and has always been made available by the IARU member societies through a range of printed publications and internet resources. However, in recent years, it has been observed that an increasing number of Amateur Radio operators can be heard operating data and telephony modes as well as beacons that*

*transmit position and propagation data within the CW communication subbands. Non-Morse stations within the CW sub-bands are getting more aggressive and more confident, believing that they are "entitled" to do what they do.*

These quotes give United States Amateurs a warning we must heed. Like the Region 1 plan, the CTT plan will not work because Amateurs will not show the required goodwill without the motivation of regulation.

2. Additionally, the bandplan promotes spectrum inefficiency by allowing any mode anywhere with no bandwidth limit. In an article in the December 2005 edition of CQ Magazine, columnist Don Rotolo (N2IRZ) states:

*...a flat bandwidth maximum of 3.5kHz is proposed (with an exception for AM), raising quite a ruckus in the digital community. . . Considering the service that the emergency response community wants and needs, which is a relatively fast data channel than can span one to three hundred miles, such a narrow bandwidth does not meet the need.*

3. What is obvious is that if there is no limit on bandwidth and no subband regulation, the users that Mr. Rotolo refer to will soon have 25kHz modes working on HF. In fact, there is nothing in the CTT proposal that prevents a 200kHz data signal on HF provided enough of the band is not in use. Once the band is tied up by one or two data users at 150kHz, thousands of other amateurs will be unable to enjoy the use of Amateur Radio.

4. In my opinion, this plan represents a takeover of the bands by voice users (and ultimate wideband data users) and an attempt to kill telegraphy. Telegraphy remains the second most popular mode with 30% usage (60% SSB and 10% data) and as such deserves the quiet enjoyment of spectrum as it does today.

5. For these reasons, I ask that the CTT Petition (RM-11305) promptly be **denied** by the Commission.

## **RM-11306 (ARRL) Petition**

6. The Commission should be aware that the ARRL did not seek a vote of members before filing this petition. In fact, many Board members promised that members would see a bandplan before the petition was filed. The Commission should be well aware by now (and from comments already filed) of the irregularities in the first Ad Hoc Committee wherein the supporters of WinLink took over the proceedings and refused to allow opposing views. It is true that for the entire process, the direction for the petition comments came almost exclusively from digital proponents. And although the League asked for email comments, there were statistics published on the results of those emails.

7. As an ARRL member I am embarrassed that the League seems unable to take the lead and build Amateur consensus on issues such as this. A simple yearly vote of members on issues the League plans to file before the Commission to see how members and non-members feel would be sufficient groundwork upon which to build credible suggestions.

8. In addition to the lack of a foundation for this petition, it is technically unsound. The plan as proposed opens the door for the implementation of something much like the Region 1 Bandplan which is coming into some question as outlined in the comments re: RM-11305. Another area where the ARRL petition fails is in the mixing of digital and analog voice modes (and CW). Here's what official comments to the Region 1 Plan are saying:

*General Conference, Davos, 11 to 16 September 2005, IARU Region 1 HF Bandplan Principles from the "Key points and proposal" section: "Experience shows that telephony and digital modes cannot share the same segments, and should be assigned separate segments in the HF band plan. **The establishment of all mode segments, mixing analog and digital modes, should be avoided because of mutual interference.***

Twenty years of experience with cellular phone networks and over 12 years with digital technology testing show that digital and analog modes are mostly incompatible from an interference perspective. In Amateur Radio, there is no way presently for a digital station to detect an ongoing conversation before transmitting. When interference occurs, there is no way for an analog voice or CW user to identify the station so there is no consequence to interference.

9. The Commission should also know that when the ARRL is asked why this petition is needed, the response from League Officials is often a wink and a statement much like, "The FCC is sending us hints that we should do something before they do it for us."

10. It is my firm belief that with participation from a more rounded cross section of Amateurs, the ARRL petition could have been fixed. Changing the 40 meter spectrum allocation for 200hz modes to match that of 20 meters would be consistent and offer more fairness to telegraphy users (than the 35kHz offered in the ARRL plan). Relegating automatic stations to segregated subbands would remove much opposition as well as interference. Willingness to do some mode segregation in the overlay bandplan could remove most of the remaining interference issues.

11. But this openness was not fostered by the League. In fact, the ARRL continues to make policy behind closed doors. Without fairness, there can be no trust. Without participation there can be no consensus. If indeed the Commission is sending messages to the ARRL, one of those messages should be to get their act together where involving members and building consensus is concerned.

12. I am glad that I am an ARRL member and believe that we should present a unified voice before the Commission so there is no doubt what we collectively want and need. Petition RM-11306 is not it. I ask that RM-11306 from the ARRL be promptly **denied**.

13. Furthermore, I request that whatever action the Commission ultimately takes that it include the necessary bandwidth for AM users. A growing number of Amateurs are discovering the rewards of refurbishing old Amateur equipment and using this equipment on CW and AM. Other users are exploring the leading edge of amplifier design with Class E amplifiers and beyond. These uses purport well with the purpose of Amateur Radio as it encourages experimentation and learning in the technical arena. This knowledge transfers well to other leading edge industries like the cellular telephone companies and computer related organizations. When I personally look to hire someone for a technical job for my employer, I always am encouraged by Amateur Radio operators who apply and demonstrate skills in technical areas. This positive aspect of Amateur Radio operators using old AM gear offsets any small amount of extra spectrum needed for the mode. By limiting use to specific frequencies like the current bandplan does, the impact on SSB users is minimized.

Thank the Commission for taking the time to read my comments.

Signed Electronically ,

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