

Ref: FCC RM-11306

This proposal from The ARRL is, in nature, the same as one already ruled on by the FCC on November 24, 2003.

In RM-10740 the FCC ruled on a request restricting bandwidths within the amateur service. In this ruling the Commission stated:

“We conclude that petitioner’s request for an amendment of our rules is inconsistent with the Commission’s objective of encouraging the experimental aspects of the Amateur Radio service.”

This petition does just that. Referencing the proposed ARRL bandplan as published on page 72 of the June 2005 issue of QST shows the similar nature of this proposal to that of RM-10740.

RM-10740 petitioned for bandwidth limits of 2.8 khz for SSB (J3E) below 28.8 mhz with an exception for AM (A3E) of 5.6 khz. This would have discouraged the “experimental aspects” for J3E operators.

In effect, the ARRL proposal accomplishes just that. In their proposed bandplan they call for a maximum bandwidth of 3 khz throughout the majority of the HF amateur spectrum with exceptions for AM and ISB operations. This ultimately excludes SSB (J3E) operators from the “Commission’s objective of encouraging the experimental aspects of the Amateur Radio service.”

The Commission also ruled on RM-10740 that:

“The petition also fails to demonstrate that a deviation from the Commission’s long-standing practice of allowing operating flexibility within the Amateur Service community is either warranted or necessary.”

The ARRL has stated that it sees a change is needed. However, their view is somewhat myopic. Along with the bandplan published in QST they make this statement:

“The initiative is aimed in part at encouraging new digital modes, but the primary emphasis is to avoid having to write a new rule every time a new mode bursts onto the scene.”

With a 3 khz limit throughout the majority of the bands the League has put an de-facto limit on the development of new modes. Further, should a new mode other than “digital” “burst onto the scene”, those experimenting with it would be limited without the re-write the League wishes to avoid.

Therefore, I recommend the Commission rule against this petition in whole. It is, in effect,

“inconsistent with the Commission’s objective of encouraging the experimental aspects of the Amateur Radio service.”

Julius B. Chiller Jr.

WD8BIL