This Petition for Rulemaking is so poorly drafted that it must berejected. There are at least three major faults with the Petition as filed
by the ARRL. First, it redefines bandwidth in such a manner as to be meaningless. Second, it uses expressions that are not defined. Finally, the Petition proposes to allows semiautomatic operation to occur throughout the Amateur bands. Each of these is discussed below.

The new proposed Section 97.3(a)(8) defines bandwidth as "[f]or a given class of emission, the width of the frequency band which is just sufficient to ensure the transmission of information at the rate and with the quality required under specified conditions." At present Section 97.3(a)(8) defines bandwidth as "[t]he width of a frequency band outside of which the mean power of the transmitted signal is attenuated at least 26 dB below the mean power of the transmitted signal within the band." While "a given class of emission" is undefined (see below) it appears to mean one of the various maximum bandwidths allowed for the various sub-bands or specifically, one of 200 Hz, 500 Hz, 2.8 kHz, 3.5 kHz, 9 kHz, or 16 kHz. Under the current bandwidth definition, a signal that has a 2.8 kHz bandwidth must be attenuated by at least 26 dB at the frequency edges of the signal. Under the proposed definition of bandwidth, there is no such requirement. If the signal were attenuated by .0000001 dB (or less) at its frequency edges as long as the signal width was "just sufficient to ensure the transmission of information at the rate and with the quality required under specified conditions" it would meet the proposed bandwidth definition. That same signal might be attenuated by 26 dB at 2.8 kHz and still meet the requirements for a 200 Hz bandwidth signal as long as it was "just sufficient to ensure the transmission of information at the rate and with the quality required under specified conditions." This means that a normal SSB signal (or any other legal signal) whose bandwidth was "just sufficient to ensure the transmission of information at the rate and with the quality required under specified conditions" could be transmitted anywhere in the Amateur bands. In a word, this removes all restrictions for
signals of any bandwidth anywhere within the Amateur radio bands.

The Petition proposes language for Section 97.3(a)(8) using the language "a given class of emission." The Petition proposes language for Section 97.3(a)(42) using the language "allocated frequency band." These terms are not defined in the existing Part 97 nor are they defined in the proposed change. Failure to clearly state what these terms mean leads to confusion

and dispute.

The Petitioner concedes than what is commonly referred to as "fully automatic control" is problematic in the HF bands (see Paragraph 15 of the Petition for Rule Making). The reason that this type of operation is a problem is that stations operating under such control can and do initiate transmissions that interfere with ongoing communications. This point is conceded in Paragraph 15. Then the proposed change tries to reason that what is commonly called "semi-automatic control" should be allowed to operate freely within the HF sub-bands where other similar bandwidth operation is allowed (see Paragraph 16 of the Petition for Rule Making). Unfortunately, stations operating under semi-automatic control can and do interfere with ongoing communications as well. While one of the stations operating under semi-automatic control has an operator present who can insure the particular frequency is not being used, the station without an operator present does not do so. It is very common
in high frequency operation that only one end of a two-way communication can detect that a particular frequency is in use. If the only end that could make this etermination is the station without an operator being present, then the ongoing communications will experience interference. This is not a hypothetical point as it does currently happen with great frequency. The obvious solution is to segment both fully automatic and semi-automatic operation to a small portion of the available frequency bands to preclude such interference.

For the reasons as stated above, this Petition for Rulemaking must be rejected.

Robert Campbell
W0MT

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