

As a FCC licensed amateur operator for over 30 years I wish to state my objections to the ARRL proposal in this instance.

FIRSTLY, the ARRL does not represent a majority of United States licensed amateur operators as comparing their membership total with the FCC amateur total will show. In this instance I strongly disagree with the ARRL even though I have been a member since 1972.

Further, the process by which the ARRL arrived at these recommendations was flawed as the bandwidth petition group was apparently comprised mostly of those favoring digital modes, including email via shortwave.

SECONDLY, the very existence in the amateur bands of signal types which are not readily decodable by listeners obviates amateur radio operators from self-policing. It also provides a means for business and commercial messages to be routinely carried via amateur radio in violation of international agreements and long-standing FCC policy and regulation. Terrorists could also find the ability to send and receive secure shortwave emails useful for their vicious acts.

The only systems I know of that are permitted on the amateur bands currently and which meet the foregoing are Pactor II and Pactor III emissions. The chief proponent and supplier chooses not to release the full specifications so amateur operators can monitor such transmissions. The only way is apparently the purchase of a very expensive modem from the sole supplier and inventor whose company is in Germany.

I respectfully request the Commission declare such secretive modes illegal on the amateur bands unless and until full disclosure to the amateur community has been made by publication with the usual restriction barring commercial production of Pactor II/III units without licensing such rights from the patent holder. The individual should be permitted, indeed encouraged, to build a unit for experimentation. I believe the inventor is restricting the system information for commercial reasons not correct on the amateur bands.

Pactor I is acceptable since the specifications are known and multiple sources offer means of "reading the mail"

Amateur radio was never meant as a secure way of sending confidential messages and to allow such use will raise the level of suspicion with which many nations already view radio hobbyists.

THIRDLY, automated message stations are not capable of doing the required checking for occupancy as a human operator is required. Nor may one politely ask such an automatic message station to stand by or adjust frequency.

Automatic and "semi"-automatic messaging stations ought be restricted and co-ordinated much the same as automatic voice repeater stations already are, including assignment to specified frequency channels, but definitely not allowed to roam over a large portion of the amateur bands creating interference.

In view of the real world data rates and the demonstrable fact that internet wireless is moving to even higher GHz ranges due to bandwidth needs, any attempt to promote a shortwave Internet is doomed to failure. Note the BPL systems apparently need nearly 70 MHz in order to deliver service (the early BPL called for use of 2 through 80 MHz signals over radiating powerlines!

AX.25 packet and Pactor I can provide the amateur to amateur and true emergency messaging on a narrow segment of each shortwave band.

Having such operation either fixed or confined means that accidental interference to and from such station is less likely and reliability greater because human operators will know where to tune.

Digital emissions including RTTY are not really compatible with human readable Morse or analog voice. Originally SSTV was transmitted after first establishing analog voice contact and naturally ended up in the voice sub-bands. Allowing digital full access will be like mixing bicycles, minivans, and wide-load semi-tractortrailers on the interstate highways. It is a disaster in the making. Each need their own lanes.

FOURTH, I reject the ARRL and others claim that experimentation is hampered. The STA (special temporary authority) is an excellent way to assure that new signals for either commercial or terroristic purposes will not go un-noticed while allowing responsible experiments. Many new and effective means of sending data and pictures have been devised using computer soundcards and ssb radios.

This commentator also believes SSTV and other wide signals ought be permissible using AM or FM as their transmitter. Perhaps thought should be given to time-sharing as the amateur bands are less occupied after midnight simply due to most operators in the U.S. being asleep. Those hours could accommodate more wide signals.

FIFTH, while AM is perhaps not so spectrum efficient mathematically, it does allow for easier listening and is easily heard by the shortwave listener with simpler radios. This may still be one of the ways new people will enter amateur radio. The ARRL apparently intends some exception to the bandwidth proposal for AM, i.e. DSB, but what about DSB with reduced or no carrier and NBFM via antique phasing radios. There are few but since there are few where is the need to ban those signals.

Regarding so called HiFi audio it may be necessary to set limits on the audio frequencies transmitted just as is done on the Broadcast AM band. And those limits might be tighter, perhaps 5 kHz with modern "brick-wall" audio filters, since amateur may not, by law, transmit music. It should be noted that there is ample room for wider signals above 28 MHz and it is hoped HiFi audio could be approved there.

SIXTH: Half a century of observation of people at work and play makes it obvious that any activity which does not have clearly understandable, fair, and enforced rules will degenerate into a free-for-all where the biggest, meanest man takes anything he wants and the rest fight over the scraps. This is not a way to promote amateur radio. What has, or hasn't worked in Canada, for instance, is not assured to work in a nation with twenty times as many operators and different worldviews. It may be helpful to remember that for many years the FCC restricted U.S. voice operations slightly in order that Canadians and other foreign operators would have frequencies free from our usually more powerful stations.

Perhaps if regulations could be written specifying that CW Morse code operation should use the first available frequency on the lowest edge of the band, moving upward towards the fixed segment assigned solely to packet/Pactor, whilst narrow digital would select the highest frequency just below the auto segment and new activity would move down towards the low end. Similarly, just above the

frequency of the auto segment would be the initial channel for wide digital ,moving higher as more operators came on but with traditional analog voice beginnng at the extreme high frequency edge of the band and new analog voicecontacts taking the next available lower channel. There must be some "lane dividers",even if they are moveable.

THEREFORE,I respectfully request that RM-11306 be DENIED in its entirety.