

The proposed changes submitted by the ARRL's Petition for Rule Making filed November 14, 2005, RM-11306, asking for the Commission to regulate the Amateur Radio bands by necessary bandwidth rather than by mode will not enhance experimentation and knowledge growth. The petition recommends the change will create "a shift in regulatory philosophy that will encourage and enable development and refinement of digital techniques and advanced technologies". I disagree. Entering voice modes, (SSB as an example), with digital modes have the potential to create conflict, discontent, and confusion within the amateur bands. Encouragement, development, and refinement of digital techniques require segmentation of operating modes. I can see where considering the enhancement of amateur bandwidths for certain modes of operation would be advantageous but would also suggest any changes to bandwidth should be accomplished within the operational segments allocated for that mode of operation. In addition, the ARRL's proposed changes will not eliminate the need for "cumbersome procedures" to determine whether or not new digital modes are legal under Part 97 but potentially create more work and "red-tape" for the FCC due to the operational confusion and operator conflict created by the proposed deregulation.

In closing, Amateur Radio does not need less regulation, indeed due to the heavily populated bands and those in our society who do not possess self-control and common sense, we need increased regulation. The ARRL's proposed changes would not enhance Amateur Radio service but diminish the operational environment and effectiveness of the operating spectrum.

Respectfully,

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