

I am opposed to RM11306 and my comments are as follows:

1. Regarding the ARRL proposal to regulate bands by bandwidth, the principle is sound, but there is a major potential for conflict and interference, which must be accommodated in any rule change. Automatic and semi-automatic operation should be restricted to a narrow segment of each band (for example 10-20 KHz). Amateur radio is not a broadcast medium and should not be allowed to become one. All other operations must require a control operator who definitively ascertains whether a frequency is clear before transmitting, to avoid interference. As the HF Amateur bands are routinely used for weak-signal communications, and there is currently no automatic technology to assure a frequency is not in use for weak-signal communications, operator control is imperative. The restriction of automatic and semi-automatic operations to a narrow segment of each band allows for the development of digital communication technology, while limiting the impact on routine and weak-signal communications.

2. 40 Meter bandplan is poorly implemented. General Class CW operators will end up with 10 KHz of CW subband (7025-7035 KHz), down from 125 KHz(7025-7150). As I recall this is inconsistent with the other bandplans which are recommended by the ARRL. Can there really be good justification for singleing out the 40M band. I recommend expanding the 200 Hz sub-band (CW sub-band) from the proposed 7000-7035 to 7000-7065, which reflects the past and current activity on the 40M band, a very popular CW band, while still allowing for a significant expansion of phone priveleges on 40 Meters. I certainly do not agree with the ARRL thinking on this issue.

Regards

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