

**Reply Comments to Reply Comments of Edwin C. Jones, AE4TM,
received February 23, 2006:**

In his reply comments of February 23, 2006, Mr. Jones makes a clear and convincing case for necessary separation between SSB activity and "semi-automatic" Pactor-III activity, but suggests that separation should be by means of a "voluntary" bandplan now under construction by the ARRL, and not by rule.

However, the ARRL has officially adopted a network called Winlink 2000 for its own NTS traffic system and Amateur Radio Emergency Service needs, which currently heavily relies on "semi-automatic" stations using Pactor-III. As a result, the ARRL cannot avoid having a *conflicting interest* in bandplanning that will obviously bias the ARRL in favor of publishing bandplans supporting their already-adopted Winlink 2000 network, as exemplified by the bandplan attached to RM-11306, which includes the deletion of Part 97.221(c), in order to give "semi-automatic" stations unrestrained access to "all" HF frequencies, and which totally ignores IARU Region 1 restrictions of automatically controlled digital stations on amateur bands that exhibit worldwide propagation.

AE4TM also claims (without offering any proof or examples) that, "As a result, the narrow space provided for such digital operations have had a crippling effect on any further development because there is no place to operate any such new modes."

Mr. Jones also neglects to mention that a "Special Temporary Authority" is already available to permit further development and testing of new digital operations, and at the same time, serves to protect the interests of all others not using those modes from potential abuses of the amateur radio spectrum.

The current Part 97 rules already provide *enforceable* separation between SSB and "semi-automatic" Pactor-III activity (by virtue of the bandwidth of Pactor-III being over 500 Hz) and any deletion of Part 97.221(c), as suggested by AE4TM and the ARRL, would serve to overturn the Commissioners Report and Order of 1995 (PR Docket 94-59) that states that 3.8% of the HF amateur radio spectrum will be all that will be allowed for the activities of any type of automatically controlled digital stations with emitted bandwidths over 500 Hz.

It is strongly recommended that any suggested deletion of Part 97.221(c) be denied, as no significant additions to the HF amateur radio spectrum have occurred since 1995 (except for a small slice of spectrum for the 60 meter band), and therefore there is no justification for overturning the 1995 decision of the Commissioners.

Respectfully submitted,

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