

Comment on Petition RM-11306

The ARRL has submitted RM-11306 in a misguided attempt to address the problem of band over-crowding. Here are my objections to RM-11306 and why I believe the FCC should deny this petition:

1) Way too many amateur radio phone operators are using far more bandwidth than is necessary in order to get their signal through. It seems to be a testosterone thing to run as much power as possible and to splatter one's signal in as wide an area as possible. The answer to this problem is not to increase the bandwidth available to phone use by getting rid of the CW only segments of the band - this would only reward bad behavior. The answer is to enforce the existing requirement to only use the minimum of power to make and maintain the contact. And enforce the requirement that amateurs are to maintain their equipment and operate in such a manner that excessive bandwidth is not used to make a contact in a particular mode.

2) Separation of bandwidth by modes is sensible. An operator running a digital mode has no idea if he is interfering with CW or phone and vice-versa – the affected party has no means of registering an immediate complaint and asking that the interference cease. This is particularly the case with the WinLink robots – how am I supposed to communicate with them if they stomp on my contact? My personal opinion is that the Internet does an admirable job of serving the need for digital communications, particularly email, and there is absolutely no need to make the amateur radio service simply another fiefdom of the internet. Send the WinLink robots back to the Internet and keep them there.

3) RM-11306 does nothing to address one of the primary causes of band over-crowding and harmful interference – contests, including those sponsored by the ARRL. These contests are comprised of many thousands of “wham-bam-thank-you-mam” QSO’s in the drive to accumulate contest points. Many contesters could not care less about whether or not they are causing interference to non-contest stations and whether or not they are operating outside of their mode’s bandwidth designations. If the ARRL really wanted to show leadership in this area it could announce that for the contests they sponsor no points will be awarded for contacts made out of the mode’s bandwidth and that infractions will serve to cost the participant points. My personal opinion is that all organizations that run contests should be required to monitor them and self-police them so that the contests are not unduly disruptive to those licensed radio amateurs who choose not to take part.

In summary, I am asking the FCC to deny the RM-11306 petition as it does more harm than good. WinLink should be banished as it constitutes automatic and unmonitored control of a frequency, separation of bandwidth by modes should be maintained, the rule to operate minimum power to make the contact should be

enforced, and contests should be reined in – these things would dramatically alleviate the perceived over-crowding problem.

Sincerely,

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