

Gentlemen:

I am offering my comments on Document WAC/137(04.10.06), the draft proposal of Informal Working Group 4 (IWG-4) as it applies to Article 5, Section IV frequency allocations in the 5 MHz spectrum ("Document").

Summary of Comments:

I strongly support the proposal to expand the 5 MHz allocation to the Amateur Radio Service. I further recommend removal of channelization requirements and the expansion of permitted modes to include A1 (CW).

Background:

I have been a licensed radio amateur for thirty-nine years and hold an Amateur Extra Class license. I am a member of and occasional instructor for the Auxiliary Communication Service of the Los Angeles Fire Department. I am a member and Assistant District Emergency Coordinator of the Amateur Radio Emergency Service in the Los Angeles Section. I have completed all levels of Emergency Communications training from the American Radio Relay League as well as various courses from the Federal Emergency Management Agency. I am a trained Community Emergency Response Team (CERT) member and an accredited Volunteer Examiner for amateur radio license examinations.

Detailed Comments:

Southern California's large population, economic significance and seismic susceptibility place it at relatively high risk for natural and man-made disasters. Its topography limits line-of-sight radio communications, increasing the reliance of local radio amateurs on systems of VHF, UHF and microwave repeaters that, while numerous, represent only a small and somewhat vulnerable portion of the array of communication channels that will be needed in a widespread disaster.

The ultimate, failsafe resource for regional communications independent of any infrastructure is amateur radio's access to high-frequency (HF) bands. As accurately noted in the Document, there is a need for frequencies above the 80/75 meter amateur band and below the 40 meter band. Near-Vertical-Incident-Skywave (NVIS) techniques allow for communication over an area hundreds of miles across using the ionosphere as a reflector, but success depends on access to and selection of the proper frequencies.

During periods of low solar activity, the often-heard rule of "80 meters at night, 40 meters during the

day” does not apply. I have monitored both actual band activity and near-real-time ionosonde information for over a year and have found that the critical NVIS frequency (foF2) during daylight hours is very often around 5 MHz, too low to use the 40 meter amateur band but high enough that E-layer absorption of signals in the 80-meter band is significant. The best – and sometimes only - choice for regional HF NVIS communication is the 60-meter band. In any widespread disaster, and especially in densely populated areas, five voice channels are inadequate to handle what will likely be a high demand for communication links. A wider allocation of spectrum for amateur radio use will be a major help in solving this problem.

Similarly, amateur radio operators can make the best use of the 60-meter band if they have the flexibility to select their operating frequencies within the band, as they do now on all other HF bands. The present channelization scheme precludes this flexibility and should be abandoned. As for mode, amateur radio operators should be able to take advantage of A1's (CW's) narrow bandwidth and improved reliability under sub-optimal field conditions should circumstances dictate. Further, the present restriction to single-sideband emissions makes even the use of a carrier to adjust an antenna tuner technically illegal. Adding A1 to the list of permissible emissions would promote efficient use of the spectrum and help enhance effective communications in times of need.

Thank you for considering my comments and for your work on this important matter.

Respectfully submitted,

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