

Comment to the Ex-Parte revision RM-11306

I am strongly opposed to any change to 97.221 that would allow automatically controlled digital stations to operate outside the current digital subbands. I am also strongly opposed to the deletion of the rule that says that "No transmission from the automatically controlled station occupies a bandwidth of more than 500 Hz".

Automatic PACTOR stations create horrific QRM as they do not listen before transmitting and semi automatic PACTOR stations basically create the same problem due to the vagaries of HF propagation. I've had dozens of digital mode QSO's wiped out when a very wide PACTOR 2 PMBO station has begun transmitting on top of my QSO.

As a member of the ARRL I was not polled for my opinion on this issue, therefore they do not reflect my view on the subject. I strongly urge the FCC to dismiss this proposal with no further action.

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