

Comments filed regarding the ex-Parte filing of Feb 14,  
And the "Erratum" filed on March 22 of RM-11306

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To whom it may Concern,

I am adamantly OPPOSED to both the ARRL Proposal RM-11306 ex-Parte filing of Feb 14, and also to the "Erratum" filed on March 22 in their entirety. The ARRL does not represent the interests of this amateur operator on these issues.

I am all in favor of Experimentation in all fields of the Amateur Service, and of the development of new Digital Modes. This is one of the greatest aspects of being a part of it. But to impose restrictive bandwidth regulations on popular existing Voice modes on 10 meters and VHF in order to benefit a new mode's parameters/operation is not conducive to the future and well being of the Amateur Service. No bandwidth regulation changes need to be implemented. I believe that this will severely hamper experimentation in the existing modes.

This proceeding, if enacted, would also be very difficult and expensive to enforce.

Bandwidth measurements by distant stations are nearly impossible to accomplish with accuracy due to a variety of factors, mainly the lack of laboratory grade measurement equipment within the amateur community.

This will cause an entirely new class of complaint that must be dealt with by an already understaffed and budget restrained FCC.

This new class of complaint will be for Perceived Bandwidth Violations.

This proceeding also permits operation of Robotic type stations through out the bands with no provision to provide protection against either on-frequency or adjacent frequency operation by other stations.

The effect will be interference to ongoing communications that were occupying the frequency first. Also, Digital and Analog signals in the same pass bands are just plain In compatible. The Human operator cannot just "tune-out" the offending signal with his ear/brain combination as he can with another Analog signal.

To alleviate these possibilities, Pactor and Winlink need to be segregated to there own sub-section of the bands.

I am also opposed to allow the 100Kc wideband OFDM and QAM right in the middle of the current coordinated repeater sub-bands on 2 meters.

Again, I am adamantly OPPOSED to both the ARRL Proposal RM-11306 ex-Parte filing of Feb 14, and also to the "Erratum" filed on March 22 in their entirety. I feel that RM-11306 needs to be completely denied.

Thank You,  
Michael J Talkington  
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