I fully support RM-11306; Regulation by Bandwidth and the deletion of 97.221C(2). The FCC should reject the widespread promotional efforts of a very few who use false data and scare tactics to keep the Amateur Radio service from moving forward. Vision and courage are needed to create the regulatory environment which both enables and encourages the Amateur Radio service to develop and deploy modern digital communications; a proven and important capability for emergency communications.
Although the ARRL has revised RM-11306 to exclude the HF bands, I wish to continue to support the deletion of 97.221 C (2) in order to enhance the radio Art.

Self-regulation is and has been a hallmark of the Amateur Radio service. Voluntary band plans to include designated-purpose frequencies, repeater coordination councils and other mechanisms work well. We should expect them to continue to do so in the future.

Moving to regulation by necessary bandwidth and not mode and relying upon voluntary band planning will create a manageable regulatory environment that will encourage the future development of new and efficient digital modes for both voice and data, bringing Amateur radio into the 21st Century and up to today's communications standards.

Due to the growth of digital communications in its role as a proven and effective method of supplementing emergency communications, especially where normal infrastructure has been damaged or destroyed, I am most concerned that there is no reasonable provisions for such operations in the current unreasonable band spaces now offered in 97.221 C (2) for "local or remote control."

I am in favor of establishing the Amateur Radio sub bands by bandwidth rather than mode, a change that has been long overdue. I believe that the nearly 100 years of ‘Ham Radio’ history provides evidence of a positive and valuable tradition of self-regulation that has historically been prompted by the Federal Communications Commission. I believe this change is particularly important for modernizing Amateur Radio support for Emergency Communications (EMCOMMs)and certainly should advance the state of the Amateur Radio Art which is mandated. To be certain, such a sweeping change may rival those from spark to CW (circa 1920s), CW to voice (circa early 1930s,) and AM to SSB in the late 1960s, with enthusiasts both pro and con providing pertinent comments. Comments on this issue on modern internet blogs and some filed with the Commission to date indicate a mixture of serious technically-founded and competent to the flawed, more emotional, ill-informed, and less rational. The Commission is encouraged to make an evaluation of this matter in the manifest best interest of the public which includes casual Ham Radio operations, the future of the Amateur Radio Service, and the public that is served.

Since 1988 I have been involved with the development, planning, and implementation of the original

APLINK system that, in the short span of 17 years, has evolved into the Winlink 2000 (WL2K) system serving thousands of ham radio operators around the world. This digital radio system of employing "E-mail over Ham Radio" for hams traveling the oceans of the word, the back roads and highways, or supporting humanitarian disaster-recovery and relief efforts anyplace on the globe where there is no connection to the Internet is an outstanding modern example of hams advancing the State of the Radio Art as well as providing a 21st Century tool for Public Service.

Typical Ham Radio record message handling is done on radiotelephone (voice) circuits, which cannot support transfers of long texts, information, data or images. Amateur Radio emergency communications (EMCOMMs) support groups such as the Amateur Radio Emergency Service (ARES,) Radio Amateur Civil Emergency Service (RACES,) the Military Affiliate Radio Systems (MARS,), and faith-based Ham groups have added WL2K capability to their various radiotelephone (voice)-based systems thus bringing machine-based error-free information exchanges between any e-mail addresses in the world during times of emergency. There is now a commonly-used method (conventional e-mail messaging) to exchange error-free detailed or complex information such as medical reports between a disaster in the Gulf coast and a medical specialist in Cleveland. This also frees Ham Radio voice circuits for needed local administrative and disaster recovery needs.

Since Katrina in 2005 Emergency Management Authorities (EMAs) such as state, county, and city departments of Emergency Management and Public Safety along with the Department of Defense (DOD,) and the Department of Homeland Security (DHS,) have embraced Ham Radio support using the WL2K system.

Respectfully submitted,

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