

I oppose the RM-11392 petition by Mark A. Miller seeking to change Amateur Radio Service automatically controlled data stations and narrower bandwidths on HF.

The RM-11392 petition's proposed 1.5kHz bandwidth limit on data emission is too narrow for established international standard transmissions and equipment bandwidths used by the Amateur Radio Service.

The FCC Amateur Radio Service's automatically controlled data sub-bands are already too narrow for the huge volume of traffic that runs on them. If a limit of 1.5kHz bandwidth is applied, it will severely hamper the ability of amateur radio operators to share these small band segments efficiently through rapid data time division methods.

The Amateur Radio Service relies upon international communications standards. Many of the present digital data communications standards require bandwidths in excess of 1.5kHz. The normal amateur radio service bandwidth limit by governments of other countries is 6kHz or more.

RM-11392 petition has not presented a compelling need to change the rules for Automatically Controlled Data Stations on the HF bands.

Thank you.