

I oppose this proceeding and a step backward in innovation for ham radio.

I strongly oppose limiting digital automatic transmission on the HF bands.

I strongly suggest leaving the bands as they are unchanged for the following reason:

- 1.) With the number of hams declining, and a decline in the use of CW modes, there really is no substantial risk of overcrowding in this spectrum
- 2.) The automatic PACTOR II & III modes are an invaluable service to nautical hams in urgent situations when no other communication may be available, ie., cell phone or available HF phone operators. This is an innovative method of safety of operation for nautical operators.
- 3.) If limitations in the use of automatic PACTOR use were really necessary, why not just band segregate their usage rather than completely ban them.
- 4.) The hobby of ham radio would be better suited to increase the number of available operating modes to encourage further hams use of HF spectrum.

Michael K3MH