

To whom it may concern:

I support the effort to clarify the regulations regarding data emissions on the HF bands allocated to the Amateur service.

Specifically, I support the thoughtful regulation of wide-band adaptive digital modes and automated digital stations in ways which ensure they do not interfere with the operations of stations operating under manual control using other narrow/fixed-bandwidth digital modes, phone, CW, etc.

While I feel there is a place for digital innovation in the Amateur service, I have noticed that the primary use cases of wide-band digital modes are systems which place a thicker than usual layer of abstraction between the operator and the transceiver which leads to ignorance of shared spectrum and (perhaps unintentional) discourtesy to other operators. I therefore support and encourage the restriction of these modes by whatever criterion necessary to ensure that their operation does not interfere with traditional Amateur operation.

I reject the argument that wide-band digital modes are essential to the provision of emergency communications. As the FCC is well aware, emergency communications can be effectively accomplished using any mode, and has been since the inception of the Amateur service. Providing binary file transfer and Internet e-mail gateways to "served agencies" (using wide-band data modes on HF) is a luxury in an emergency situation, not a mandate.

Thank you for your time spent reviewing this matter.

Sincerely,

Josh Freeman

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