

I oppose the petitioner's proposed method of changing the automatically controlled station data subbands.

The use of automatically controlled data stations has increased tremendously since the original FCC rule was written. We do need change, to increase the spectrum available for automatically controlled stations.

It would help alleviate crowding and facilitate efficiency on the amateur radio bands, to widen the automatically controlled data subbands to the following frequency band segments: 1805kHz-1825kHz, 3575-3600kHz, 7100-7125kHz, 10130-10150kHz, 14090-14099kHz, 14101-14150kHz, 18090-18110kHz, 21090-2150kHz, 24900-24930kHz, 28100-28189kHz.

The petitioner cites the current rule for HF symbol rate limitation of 300 baud on data transmissions. This rule is obsolete and serves no purpose in the 21st century. Therefore, please delete the 300 baud symbol rate limit from the FCC rules. It was only valid in the mid-20th century when we had simple FSK transmissions. Today's complex digital waveforms using OFDM, MFSK, PSK, and others do not benefit from a symbol rate limitation. The 300 baud symbol rate limit prevents USA amateur radio operators from communicating with some of the digital transmissions that amateurs of other countries are presently using. It prevents the amateur radio service from utilizing existing federal standard digital data methods for interoperation, inter-service compatibility, economical equipment, and common signalling methods.

Sincerely,

Bonnie Crystal

Amateur Radio Operator KQ6XA