

I strongly oppose the RM-11392 petition for the following reasons!

1. The RM-11392 petition is very bad for the amateur Radio Service. The RM-11392 petition seeks to destroy digital data technology advancement in the Amateur Radio Service. The RM-11392 petition's proposed 1.5 kHz bandwidth limit on data emission is too narrow for established international standard transmissions and equipment bandwidths used by the Amateur Radio Service.
2. The RM-11392 petition is an attempt to kill innovation, technology advancement, and emergency data communications in the Amateur Radio Service. Please do not let this happen. The use of digital communications (Winlink) is a critical emergency communications link that is being adopted throughout the country to permit rapid HF data communications into and out of major disaster areas. Several of the primary established HF emergency communications networks currently in service and utilized by thousands of Amateur Radio Operators in USA would be totally eliminated or hobbled if the objectives of the RM-11392 petition were to be adopted.
3. 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 1.5 kHz bandwidth is applied, it will severely hamper the ability of amateur radio operators to share these small band segments efficiently through rapid data methods.
4. There is a huge installed base of Amateur Radio Equipment, and millions of dollars of monetary investment by thousands of Amateur Radio Operators that use HF digital data systems with more than 1.5 kHz bandwidths. This investment by FCC-licensed operators would be taken away or rendered useless if the objectives of the RM-11392 petition were to be adopted.
5. The Amateur Radio Service relies upon international communications standards. Many of the present digital data communications standards require bandwidths in excess of 1.5 kHz. The normal amateur radio service bandwidth limit by governments of other countries is 6 kHz. Thousands of licensed Amateur Radio Operators would be disenfranchised if the objectives of RM-11392 were to be adopted.
6. The RM-11392 petition is comparatively similar to an Analog Cellular Phone service entity trying to eliminate newer Digital Cellular Phone service. The fact is, Amateur Radio is now using faster time-multiplexing digital methods to enable more stations to efficiently use the same frequency channels simultaneously or in rapid succession. These time division techniques require at least 3 kHz of bandwidth.
7. RM-11392 petition has not presented a compelling need to change the rules for Automatically Controlled Data Stations on the HF bands.

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