

Honorable Commissioners,

I am writing as a 40-year Amateur Radio licensee and emergency-communications leader. There are several serious flaws in the proposed rulemaking, and I urge you to reject it accordingly.

This proposal is clearly designed to accomplish one goal: to eliminate the Pactor III high-speed data mode from the HF Amateur bands below 28 MHz (hereinafter "HF bands"). In choosing "not to recommend any changes to the Phone / Image sub-bands" (Petition Section 4), the petitioner conveniently deflects the issue of where to locate wider-bandwidth digital modes in the HF bands. In other words, he says where he doesn't want it but not where he would accept it. At best, this is half a proposal, Amateur Radio NIMBYism, if you will. Despite repeated references to separation of bandwidths, the petitioner offers no alternatives to removal of Pactor III, a technologically advanced mode that allows Radio Amateurs to provide unparalleled capabilities to served agencies during local emergencies and major disasters, from the bands where it is most used.

In Petition Section 6, the petitioner acknowledges that "the sub-bands set aside for use by automatically controlled stations are seeing increases in activity with newly developed modes that are not automatically controlled." This is like taking a horse and buggy onto an interstate highway and complaining that the cars go too quickly. Automatically controlled stations are allocated a mere 66 KHz below 28 MHz, less than 2% of the total amateur allocation and less than 8% of the nearly 900 KHz of data frequencies on those bands. These new-mode operators have the option to move; the automatically controlled stations do not.

In Petition Section 7, the petitioner argues his case by pointing out that Pactor III bandwidth increases to 2.2 KHz during optimal conditions, just as "more stations appear on the bands." He ignores the fact that increased bandwidth provides increased throughput and, therefore, correspondingly shortens the time that the operating frequency is occupied. Unlike many other mode users, most Pactor III users do not transmit for as long as conditions allow. Rather, they have specific traffic to pass, and the sooner it gets through the sooner transmission ceases. Again in Petition Section 13, the petitioner asserts that "Pactor II is equally spectrum-efficient as Pactor III." Unfortunately, the petitioner's definition of efficiency ignores message throughput and the time required to transmit a message of specified length.

Some of the issues raised in the proposed rulemaking are, no doubt, worthy of further discussion. However, the actions requested by the petitioner constitute brute-force destruction of a carefully thought-out and skillfully executed infrastructure supported by highly talented and dedicated volunteers. The Commission should not give serious consideration to such a one-sided, drastic and damaging proposal.

Respectfully submitted,

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