

Although the petition refers to separation of bandwidths, it neglects to recommend alternative band segments below 28 MHz. Without a more comprehensive recommendation, this petition effectively seeks elimination, not separation, of Pactor III.

I favor the present FCC rules which provide few limitations on bandwidth of digital data signals. This encourages amateur radio operators to advance the state of the art of digital technology.

I oppose the RM-11392 petition by Mark D. Miller seeking to change Amateur Radio Service automatically controlled data stations and narrower bandwidths on HF.

I oppose the petition'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.

I use automatically controlled data stations and networks on the HF amateur radio bands very often. The ability to have wider bandwidths and freedom to pick any clear frequency in the data subbands is essential for the effective operation of these systems. The services these systems provide are essential for emergency communications, furthering the purpose of amateur radio, and they are part of amateur radio's reason to exist. Please do not limit their bandwidth or spectrum any further than the existing rules already do. If anything, please expand the automatic subbands, because there has been a very large increase in use of these as technology has advanced since the rules were written.

In today's amateur radio digital environment, 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. Please abolish this antiquated rule.

Please abolish the 300 baud symbol rate limit, because it prevents the amateur radio service from utilizing existing federal standard digital data methods for interoperability, inter-service compatibility, economical equipment, and common signalling methods.

RM-11392 petition has not presented a compelling need to change the rules for Automatically Controlled Data Stations on the HF bands.

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 1.5kHz bandwidth is applied, it will severely hamper the ability of amateur radio operators to share these small band segments efficiently through rapid data time division methods.

The objectives of the petition would kill the only 24/7 HF emergency data ham radio service that can

be accessed without an external computer.

The petition brings to question the FCC limitation for HF data symbol rates. Please delete the 300 baud symbol rate limit from the FCC rules. It was only valid in the mid-20th century when we only had simple FSK transmissions.