

Ladies and Gentlemen:

I strongly oppose the RM-11392 petition for some of the following reasons:

1. Amateur radio has been the source of most of the 20th century's advancements in Communications Technology and even the most sophisticated communications technology used today including DIGITAL was INVENTED and DEVELOPED BY HAMS, many of whom are in Military or Government service to this country.

This proposal would in the future assure the US of taking a back seat to the rest of the world in communications technology.

2. America is the land of innovation and to destroy a significant portion of her future ability to lead in the world is a terrible idea. Stifling innovation is the worst thing a government can do and the RM-11392 petition is terrible for the Amateur Radio Service.

3. The RM-11392 petition would destroy digital data technology advancement in the Amateur Radio Service.

4. The RM-11392 petition's proposed 1.5kHz bandwidth limit on data emission is too narrow for established international standard transmissions and equipment bandwidths used by the Amateur Radio Service.

5. The RM-11392 petition looks like an attempt to kill Innovation, Technology Advancement, and Emergency Data Communications in the Amateur Radio Service. Please do not let this happen.

6. 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 methods.

7. There is a huge installed base of Amateur Radio Equipment, and tens of millions of dollars of monetary investment by thousands of Amateur Radio Operators that use HF digital data systems with more than 1.5kHz 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.

8. Many of the primary established HF emergency communications networks such as the Army, Navy, Air Force Marine M.A.R.S. currently in service and utilized by thousands of Amateur Radio Operators in the USA would be totally eliminated or hobbled if the objectives of the RM-11392 petition were to be adopted.

Thank you for your Attention.

Sincerely

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Licensed Ham and Army M.A.R.S. operator