

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 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.

I use digital data bandwidths wider than 1.5kHz on HF amateur radio service bands on a daily basis. The petition seeks to take this away from me. Please do not allow it.

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.

Please do not implement any of the provisions of the RM-11392 petition. They would set ham radio back to the stone age of HF digital data communications.

Please increase the frequency spectrum for automatically controlled data stations. It would 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.

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

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.

The Amateur Radio Service relies upon international communications standards. Many of the present digital data communications standards require bandwidths in excess of 1.5kHz. The normal amateur radio service bandwidth limit by governments of other countries is 6kHz.

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 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 RM-11392 petition is simply a selfish attack by an individual who wants us to use only 20th Century "frequency-division" techniques. He is trying to eliminate new innovative 21st Century "time-division" techniques from the ham bands. Please don't allow him to succeed.

The RM-11392 petition is very bad for the Amateur Radio Service.

The operators of other, non-automatically-controlled modes have many frequency options (almost 900 KHz) below 28 MHz and on every band therein. Claims of undue interference seem disingenuous when operators choose to park in the few narrow slots where automatic control is authorized.

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.

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.

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 1.5kHz 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.

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, 21090-21150kHz, 24900-24930kHz, 28100-28189kHz.

I use Pactor III. I do not use it for simple QSO's, Contesting or chasing DX. I use it for emergency communications only. I also use it for training (just like taking FEMA courses). It prepares me for emergencies. The only complaint I have ever heard about Pactor III comes from retailers that can't sell it. Please don't take this away from us. The Winlink system needs it and we need it for emergency communications. Thanks. Johnny O'Dell KA5ABQM