This person's attempt at using the ECFS form failed due to being a international address. I am inserting his comments in his behalf based on the FCC form failing to handle this type of traffic which is relavent to the RM-11392 petition:

ECFS - E-mail Filing
<PROCEEDING>RM-11392
<DATE>12/28/2007
<NAME>Werner Furlan
<ADDRESS1>Runastrasse 29
<ADDRESS2>
<CITY>Feldkirch
<STATE>AT
<ZIP>6800
<LAW-FIRM>
<ATTORNEY>
<FILE-NUMBER>
<DOCUMENT-TYPE>CO
<PHONE-NUMBER>+43552275013
<DESCRIPTION>Email Comment
<CONTACT-EMAIL>furlan@gmx.net

<TEXT>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 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 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 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 seeks to destroy 21st century digital data technology advancement in the Amateur Radio Service. Please do not turn back the clock on digital data to the 20th century.

The petition suggests that Pactor II is just as spectrally efficient and that Pactor III's increased bandwidth under favorable propagation conditions is inherently bad. Both arguments ignore the increased throughput and correspondingly shorter transmission time that go with higher speed and bandwidth. Fixed-length messages take less time to transmit at higher speeds, leaving the frequencies clear for longer periods of time.

Thousands of licensed Amateur Radio Operators would be disenfranchised if the objectives of RM-11392 were to be adopted.

In Austria the federal communication authority is going the other way and will allow all present and future modes of radio communication without further notice. This gives innovation and better technology the opportunity to evolve. Competition and liberty will lead to progress not prohibition.