

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.

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 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 RM-11392 petition is comparatively similar to an Analog Cellular Phone service entity trying to eliminate newer Digital Cellular Phone service. The fact is, Amateur Radio is now using faster time-multiplexing digital methods to enable more stations to efficiently use the same frequency channels simultaneously or in rapid succession. These time division techniques require at least 3kHz of bandwidth.

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.

