

Befor the  
Federal Communication Commitison  
Washington D.C., 20554

In theMatter of ) RM-11392  
)  
ADENDMENT OF PART 97 OF THE )  
COMMISSION’S RULES GOVERNING THE )  
AMATEUR RADIO SERVICE TO )  
IMPLEMENT CHANGES TO SECTION 97.3(c)(2), )  
97.221 AUTOMATICALLY CONTROLLED )  
DIGITAL STATION )  
97.305 AUTHORIZED EMISSION TYPES, )  
97.307 EMISSION STANDARDS, AND )  
97.309 RTTY AND DATA EMISSION CODES )  
)  
)  
)

To: The Chife Wireless Telecommunication Bureau

**Opposition to RM-11392**

Thomas R. Lafleur, Amateur radio Operator, KA6IQA

I oppose the RM-11392 petition!

The RM-11392 petition seeks to destroy digital data technology advancement in the Amateur Radio Service and drive the service back to the day of spark-gap equipment and CW. The petition will kill innovation, technology advancement, and emergency data communications in the Amateur Radio Service.

The Amateur Radio Service must advance the state of the art as required by the FCC, as have other service under the FCC guidance. This petition is comparatively similar to the Analog Cellular Phone service entity trying to eliminate newer Digital Cellular Phone

service. The fact is, Amateur Radio is now using advance digital methods to enable more stations to efficiently use the same frequency channels simultaneously or in rapid succession. These time division and CDMA techniques require at least 3 kHz of bandwidth to be effective.

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

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

If a limit of 1.5 kHz bandwidth is applied, it will severely hamper the ability of amateur radio operators to share these small band segments efficiently through new and innovated data methods. There is a huge installed base of Amateur Radio Equipment use daily for emergencies communication, and millions of dollars of monetary investment by thousands of Amateur Radio Operators that use HF digital data systems with more than 1.5 kHz 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.

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

Respectfully yours

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