

The following comments are hereby submitted to FCC as part of the public record regarding Mark Miller's petition to the FCC, presently under the proceeding number RM-11392, and pertaining to the rules of the Amateur Radio Service.

This comment is submitted by Bonnie Crystal, Amateur Radio Service licensee callsign KQ6XA.

To the FCC:

THERE HAS BEEN NO "NARROWBAND NATURE" TO RTTY/DATA SUBBANDS

Contrary to the suggestions of the present petition, there has never been a "narrowband nature" in the FCC regulations for Amateur Radio Service regarding data emissions in the Amateur Radio Bands.

With few exceptions, the FCC rules have been purposely silent with respect to finite bandwidth of emission in the Amateur Radio Service, thus reducing the burden on amateur radio licensees for the need for accurate bandpass filters, calibrated spectrum analyzers, expensive compliance hurdles, and type-approved equipment. To adopt the extremely-narrow approach to regulation that the petitioner advocates at this point in the amateur state-of-the-art would exceed the economic and technical capabilities of the average licensee.

It is a stretch of the imagination for the petitioner to construe the antiquated 300 baud symbol/second limit specifically on older FSK Radio Teletype emissions to try to force it into a new constraint on all other types of emissions. If anything, this is a chance for FCC to quietly consider the future abolition of the antiquated 300 baud rule.

CONTENT-BASED AMATEUR BAND SEGMENTATION IS NOT WORKING

FCC rules dividing sub-band segmentation of the HF bands have been "content-based" rather than "bandwidth-based".

Under present rules, amateur operators have been required to limit the content of the material being transmitted in specific segments of the HF Amateur Radio bands.

In earlier days, the content was either text or voice or image. The personal computer revolution, has enabled amateur radio operators to use any type of media and content, but the present FCC rules have stifled it. The amateur radio operators of most other countries have no such restrictions on content of transmission. On the HF bands, USA's amateur radio operators communicate daily with other countries, and this is part of the international nature of the HF bands, and of the Amateur Radio Service itself. The effect of this regulation has been to prevent communications by USA Amateur Radio Service licensees with other amateur radio stations throughout the world, whenever certain types of content is being communicated. In many cases, there is basically no digital difference between the transmission of a voice or image file and the transmission of a data file.

By continuing to regulate content in this way, the FCC risks stifling the advancement of the state-of-the-art of the licensees of the Amateur Radio Service in USA, and thus reduces the development of communications technology for the nation. The petitioner encourages the "content-based" spectrum management to continue, at a time when the FCC rules should be moving toward "content-neutral" rulemaking and international normalization.

NON-HARMONIOUS EMISSIONS CAN AND DO SHARE SPECTRUM

CW telegraphy is one of the most narrow of digital emissions, and it has been continuously allowed to share spectrum in all parts of the HF bands by FCC rule.

Almost every different type of emission is "non-harmonious" with every other different type of emission. We now have hundreds of different types of digital emissions being transmitted on a regular basis on the Amateur Radio bands.

Amateur radio operators work together to share the same spectrum in dynamic ways, and this enables all these different types of "non-harmonious" signals to be utilized on a daily basis.

If the petitioner's principles and objectives were to be applied to confine all types or sub-groups of so-called "non-harmonious" digital emissions, there would need to be scores or hundreds of segmentation intervals. The result would be wholly unworkable for a practical application to rulemaking, and result in further burden on both the licensee and the Commission.

PRESENT DIGITAL DATA METHODS SHOULD NOT BE TAKEN AWAY

If the extremely-narrow bandwidth objectives of the petitioner were to become rules, USA licensees would totally lose present license privileges on HF to transmit various protocols and formats of the following digital data emissions which are in current active use in the Amateur Radio Service: MT63, Olivia MFSK, OFDM, FDM, Fed Std-1045, 8FSK DTM, 8FSK DBM, 8FSK ALE, 141FAE-ARQ, 141-Unproto, PACTOR, PAX MFSK, and others.

Amateur radio licensees in USA depend upon the above protocols and emissions to communicate with each other and with amateur radio operators worldwide. To lose these would be a disservice and contrary to the FCC's stated purpose for the Amateur Radio Service.

As a typical example, ALE Fed Std-1045 emissions are very active in the HF bands with digital data transmissions. A log of the activity on the HF bands for this type of digital transmission in the automatically controlled data station sub-bands, has produced records exceeding 400 communications per day, recorded by 5 receivers at different locations within North America. The majority of these communications are between amateur radio operators in North America. If the FCC wishes to examine these records, they are available by request. A continuous

real-time log of such activity appears on the web for public view at:
<http://hflink.net/qso>

The loss of such digital emissions types, protocols, and systems would be a serious setback for the Amateur Radio community in America.

CONCLUSION

The present petition contains numerous inaccuracies, misrepresentations, and mischaracterizations of the current situation in the Amateur Radio Service.

The conclusions drawn and points which it advocates, are not in the interest of furthering the quality or purpose of the Amateur Radio Service. Indeed it has the potential to severely damage the Amateur Radio Service at a time when great strides in technical achievement are being made.

DISMISS THE PETITION WITH NO FURTHER ACTION

This commenter respectfully requests the FCC to dismiss the petition, and to take no further action on it.

The foregoing is true to the best of my knowledge.

Sincerely,

Bonnie Crystal

Amateur Radio Licensee, Callsign KQ6XA