

Comments by John Stephenson

"In my view, the optimal maximum bandwidths for frequencies below 29 MHz are 800 Hz at for the narrow-band segments (usually the lower frequencies in each band) and 8 kHz for the wide-band segments (usually the higher frequencies in each band). 800 Hz allows for CW, RTTY, PSK31, MFSK16 and other modes used for keyboard-to-keyboard communication and slow-speed image communication and file transfer. 8 kHz is consistent with limits in other countries (when they exist at all), allows existing AM stations to continue to operate and allows simultaneous voice/text/image communication using analog or digital modulation."

This bandwidth regulation paradigm was recently proposed by the ARRL in RM-11306. As pointed out in the comments to that petition, there are no spectrum usage studies, spectrum efficiency studies, or interference mitigation studies upon which to base the efficacy of such a change in the regulatory paradigm. Such a change could result in wide bandwidth digital data becoming impossible because of competition with high-powered, wide bandwidth SSB and AM stations.

The action in this comment provides no justification for implementation and should be ignored.