

S T E P H E N M . H I C K S

January 7, 2008

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street SW
Washington, DC 20554

Dear Ms. Dortch:

While petitioner Miller presents a well considered argument, the apparent effect and purpose of RM-11392 is to eliminate the PACTOR III emission from amateur bands. It is not clear to me why Mr. Miller feels that PACTOR III is not an asset in the Amateur Radio communicator's "toolbox" nor is it apparent from reading RM-11392 that Mr. Miller intends to correct a problem that exists in the Amateur Spectrum. Instead, it appears that he is attempting to use the FCC's own language as a device to convince the FCC that a rule clarification should be enacted to the benefit of Amateur Radio. While Mr. Miller has clearly spent considerable time constructing his plea, it fails to point out the benefit that amateurs would receive by eliminating PACTOR III.

In light of the increased emphasis that amateur communities are placing on efforts to assist the public in times of disaster and the significant gains that PACTOR III has provided these amateurs, it seems foolhardy to institute a technical rules change that would eliminate or dislocate PACTOR III emissions. I personally traveled to the Southern Mississippi Coast in the aftermath of the Katrina Hurricane for the benefit of the Salvation Army and found that PACTOR III was the only reliable communications medium that existed in remote areas. The team of amateurs I worked with attempted regular single sideband communications with the Salvation Army's regional offices in Jackson, MS, but was unable to maintain communications due to band conditions and the distance between Jackson and Long Beach, MS. During my time in Mississippi, I was in constant contact with the Salvation Army office using Winlink over PACTOR III.

In summary, I do not support RM-11392. I do understand that there are those in amateur radio that would prefer never to change the comfortable feeling and emission modes in the amateur bands. I believe Amateur Radio is a technical training ground for the technical contributors of today and tomorrow and, as such, needs to continue to offer an area for experimentation with new communication methods. More rules to limit emissions to the modes of the past is not in the best interest of Amateur Radio, the future of America's technical prowess or the communities amateurs serve.

Respectfully Submitted,

Stephen Hicks, N5AC