

Baxter County 911

Tom Fischer
OEM Director

December 27, 2007

Federal Communications Commission
445 12 Street, SW
Washington, DC 20554

Subject: Docket RM -11392

I am writing to urge the Commission to reject this proposed change in Part 97 of the FCC Rules and Regulations affecting digital communications on the 80-15 meter HF amateur bands.

The Baxter County Office of Emergency Management has invested thousands dollars in high speed data modems, high frequency radio transceivers, and associated equipment to enable reliable high speed data communications with other parts of the state and nation in the event of a large scale disaster such as a New Madrid earthquake or other natural or manmade calamity.

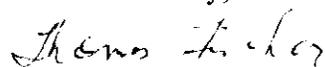
This equipment was expressly purchased to take advantage of the Winlink 2000 (WL2K) worldwide digital network using the Pactor 3 data protocol. In time of emergency the volume of critical message traffic is extremely high as was demonstrated during Hurricane Katrina. Pactor 3 requires 2.4kHz of bandwidth but is eight times faster than Pactor 2. The tradeoff between bandwidth and speed clearly and overwhelmingly favors Pactor 3 which would for all intents and purposes be outlawed on the long distance amateur bands if RM-11392 were to be approved.

I must also emphasize that simply allowing Pactor 3 in time of disaster will not suffice. Disasters may be devastating in one part of the nation but not nationwide. Katrina is a perfect example. They can also strike at any time. Therefore a national HF to internet network using automated stations and Pactor 3 must be in place and fully operational at all times. It cannot be ad hoc.

One of the primary justifications for even having the Amateur Service is its proven ability to provide vital communications backup to public agencies during times of disaster. As a professional emergency manager I was in Louisiana during Katrina and personally witnessed amateur radio's effectiveness.

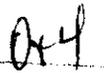
It is unfortunate that a small element within the amateur radio community for whatever reason would attempt to sabotage such a valuable emergency response tool as WL2K. This proposed rule is bad public policy and I urge you to reject it.

Yours Sincerely,



Thomas Fischer, Director

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