

Mark Miller, N5RFX, has done an excellent job describing both a real problem in the amateur radio data subbands, and a solution to remedy the problem.

I agree with the petitioner that the OFDM emission types have exploited a loophole in the rules to make use of data bandwidths that are inappropriate to data subbands governed by 97.307(f)(3) and 97.307(f)(4). Mr. Miller's proposal to recast these rules as limitations based on "necessary bandwidth" rather than "symbol rate" and "frequency shift" is an insightful method of bringing these regulations up to date for the current era.

Mr. Miller is also correct that there is little effective difference between "fully automatic" and "semi automatic" data stations, owing to the "hidden transmitter effect" on the HF wavelengths. I believe the Part 97 rules could be written most cleanly by simply deleting paragraph 91.221(c), thereby removing any distinction between them.

Thank you for the opportunity to comment.

Scott McMullen
W5ESE