

Federal Communications Commission

To Whom It May Concern:

Please enact RM-11392 into Part 97 as quickly as possible. The narrowband digital/CW sub bands need to be protected from wideband digital interference from Pactor III Winlink 2000 and other wideband digital communications.

The emcomm people say that RM-11392 will inhibit vital emergency communications. This is far from the truth. Pactor III is used mostly for private e-mail on the high seas by boaters who use their amateur radio licenses for a free e-mail service instead of paying for commercial satellite e-mail.

Winlink 2000 doesn't need all amateur radio spectrum to carry out emergency communications. They should have their own sub bands for their communications. In event of a widespread major emergency that requires more spectrum for Winlink 2000 to operate effectively for vital communications, either the FCC can designate emergency frequencies for this purpose like it has done in the past, or the Winlink 2000 stations can use whatever spectrum they need for the duration of the emergency for emergency communications only. Drills during non-emergency times can be done on their own sub bands.

Those who are against RM-11392 because they say it will inhibit experimentation and development of new digital modes are also way off base. They also don't need to encroach on the narrowband digital/CW sub bands for their activity.

Experimentation and development of new digital modes should be focused on narrowband communications. Those seeking to develop new modes should strive to accomplish more with less use of limited spectrum, instead of developing new modes that would be bandwidth hogs. If a narrow digital voice mode could be developed that would occupy only 1 KHz of bandwidth, that would be quite an accomplishment. It would be the greatest advancement in phone technology since SSB 50 or 60 years ago.

The narrowband digital/CW sub bands should be for CW, RTTY and the narrow digital modes such as PSK, MFSK and the like. Nothing wider than a RTTY signal should be allowed to operate on these sub bands.

When the Commission evaluates RM-11392, all the comments and reply comments, I ask that the Commission dismiss all the "copy'n'paste" "cookie cutter" comments as these comments required no thought and no knowledge of the proposal being addressed (RM-11392) other than following instructions to just "copy'n'paste", sign it and submit it.

In closing, I seek to remind the Commission that RM-11392 is designed to protect the narrowband digital/CW sub bands from interference from wideband digital communications. It does not seek to inhibit experimentation or emergency communications. It merely restricts the narrowband digital/CW sub bands to narrowband communications and protects these sub bands from encroachment by the wider digital signals that don't belong on these sub bands in the first place.

Respectfully Yours,

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Amateur Extra