

In the Matter of)
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Amendment of Part 97 of the) RM-11625
Commission's Rules to Facilitate Use in)
the Amateur Radio Service of Single)
Slot Time Division Multiple Access)
Telephony and Data Emissions)

To: The Commission

I support the Petition For Rulemaking filed by the ARRL to facilitate the use of single slot TDMA under Part 97 of the Commission's rules. The commission's narrowbanding initiative begun in 2004 started the move to 12.5 kHz channels using digital technology for users of the radio spectrum operating under Part 90 of the Commission's rules. While this initiative was not directed at Part 97 users, the Amateur Radio spectrum suffers from the very same spectrum crowding issues as do Part 90 users, especially in the Amateur Service 2 meter and 70 cm bands. Amateur Service Frequency Coordinators in many areas have adopted policies to encourage the use of spectrum-efficient digital repeaters and the user community has responded by deploying D-STAR, P.25, DMR and similar technologies. DMR technology is well suited to providing emergency communications as stand-alone systems can be easily networked on demand to provide a communications capability that can be expanded to meet the needs of the public safety and public service agencies often served by the Amateur Service. Amateur operators and Frequency Coordinators have taken it upon themselves to encourage and deploy narrowband technology within the Amateur Service. The Commission should be supportive of such activities by promulgating rules that encourage the continued deployment of narrowband technology. This petition is in accordance with the Commission's intent to promote spectrum efficiency, experimentation and encouragement of the Amateur Service through rules which provide for advancing skills in both the communication and technical phases of the art. The change requested by this petition will support the Commission's goals and it is respectfully requested that the Commission act favorably and without delay.

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