

Before the
Federal Communications Commission
Washington, DC 20554

In Re: RM-11625 - A proposal to amend the Commission's rules to facilitate the use of Single-Slot Time Division Multiple Access (TDMA) telephony and data emissions in the Amateur Radio Service

To the Commission:

As an amateur living in close proximity to the recent tornado disaster in Joplin, Missouri, and seeing first-hand how the need for efficient means of communication are critical in disaster relief, I am writing in 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.

I wish to encourage the Commission to expedite adoption of this proposed change as well as approving the request for a temporary authorization pending final adoption of the proposed amendment to Part 97. In support of this I wish to point out the following:

- The proposal specifically addresses codifying the specific emission type used with single-slot TDMA transmissions in the Amateur Radio Service by this technology thereby clarifying an ambiguity which exists with respect to single- versus dual-slot TDMA.
- The amateur radio service, as with Part 90 users, is hindered by spectrum crowding issues. In most areas of the United States there are no coordinated frequencies available on either the 144-148 MHz or the 440 MHz band. While the various frequency coordination bodies have adopted policies to encourage the use of spectrum efficient digital repeaters and the user community has responded by deploying D-STAR, P25, DMR and similar technologies many potential operations are withholding deployment of TDMA due to the ambiguity between stations operating as repeaters and those operating as mobile/portable/fixed stations thereby delaying the adoption of more efficient communications modes particular with respect to the rapid deployment of temporary repeater and mobile/portable stations in disaster areas.
- As proposed, these changes will remove any concerns on the part of amateurs who are uncertain of the allowability of single-slot TDMA and, if adopted, will encourage the adoption of spectrum-efficient, narrowband technology. While the amateur service is not currently under the same narrow-banding mandate as other services are, the advantages of doing so should be obvious.
- The proposed changes move in the direction of enabling the flexible use of current technology (new) commercial radio equipment within the amateur radio service.
- The example of the success found in the land mobile radio service demonstrates that TDMA easily co-exists with analog operation on adjacent frequencies with less potential interference thereby allowing closer placement of repeaters without the need for as much distance between analog repeaters thereby providing additional capacity on the amateur bands without the need to expand those allocations.
- The proposal as presented will have little or no risk of producing any negative effect on the amateur radio service and, by the nature of the request, provide better utilization of the amateur radio frequency allocations.

- The proposal is in the public interest in that it allows and encourages the continued experimentation and implementation of state of the art communication technologies which is the history and tradition of the amateur radio service.
- The proposal would also provide additional much-needed avenues of critical and flexible, emergency communications during times of natural disasters such as the recent devastating tornadoes in Missouri and Alabama, Hurricane Katrina, and other similar natural disasters..

I strongly encourage the Commission to adopt this proposed amendment of the amateur radio service rules. I would further request that the Commission consider these proceedings at it's earliest convenience.

Respectfully submitted,

James R. Duncan
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