



UNITED STATES DEPARTMENT OF COMMERCE
National Telecommunications and
Information Administration
Washington, D.C. 20230

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Federal Communications Commission
Office of the Secretary

Mr. Julius P. Knapp
Chief, Office of Engineering and Technology
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

Reference: Amendment of Parts 2 and 97 of the Commission's Rules to Facilitate Use by the Amateur Radio Service of the Allocation at 5 MHz, ET Docket No. 10-98, *Notice of Proposed Rulemaking*, 25 FCC Rcd 5108 (2010)

Dear Mr. Knapp:

The National Telecommunications and Information Administration (NTIA), in coordination with the Interdepartment Radio Advisory Committee (IRAC), recently reviewed the American Radio Relay League's (ARRL) comments regarding the Amendment of Parts 2 and 97 of the Commission's Rules to Facilitate Use by the Amateur Radio Service of the Allocation at 5 MHz (NPRM).¹ In its comments, ARRL states that, during its discussions with NTIA and the IRAC member agencies, it made its intention clear to have multiple Carrier Wave (CW) and/or "Phase Shift Keying, 31 Baud" (PSK31) communications ongoing simultaneously in a 2.8 kHz channel.² This letter clarifies and reiterates the Administration's position on this matter.³

Currently, 47 C.F.R. Section 97.303(h) requires that amateur stations transmit on five assigned (center) frequencies (5332 kHz, 5348 kHz, 5368 kHz, 5373 kHz, 5405 kHz). In the NPRM, the Commission proposed to revise Section 97.303(h) in order to authorize additional emissions. In doing so, the Commission did not propose to change the requirement that "amateur stations shall only transmit on the five center frequencies."⁴ Specifically, for amateur stations transmitting

¹ See Amendment of Parts 2 and 97 of the Commission's Rules to Facilitate Use by the Amateur Radio Service of the Allocation at 5 MHz, ET Docket No. 10-98, *Notice of Proposed Rulemaking*, 25 FCC Rcd 5108 (2010) (NPRM); ARRL Comments, submitted by Christopher D. Imlay, General Counsel, received on July 13, 2010.

² Specifically, ARRL states that: "[i]t is perfectly possible (and ARRL did make its intent clear when discussing its proposals with NTIA) to have multiple CW and/or PSK31 communications ongoing simultaneously, entirely within the 2.8 kHz channel, provided that those simultaneous communications are not limited to the channel centers." See ARRL Comments at 12.

³ See earlier Letter from Karl Nebbia, Deputy Associate Administrator, Office of Spectrum Management, NTIA, to Paul L. Rinaldo, ARRL Chief Technology Officer, May 12, 2006 (2006 NTIA Letter). This letter is attached, as Appendix A, to the ARRL Petition.

⁴ See Appendix to the NPRM at 8, proposed paragraph (h) of Section 97.303.

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emission designator 150HA1A (CW), the Commission proposed that “the carrier frequency shall be set to the center frequency.”⁵

While all five of these channels are allocated for secondary amateur service use, they are also authorized for use by primary federal stations, and these channels were provided to the amateur community in order to meet requirements for disaster communications. NTIA, as well as the IRAC member agencies, note that use of frequencies other than the five allocated center frequencies would not enhance interoperability with federal stations operating in the 5060-5450 kHz band. Such use of the amateur narrowband modes offers little possibility of interoperability with federal stations, as would be desirable in emergency situations and permitted by FCC Rules. Allowing multiple emissions within the necessary bandwidth of the widest authorized modes (2.8 kHz) increases the possibility of harmful interference from secondary amateur stations to primary federal stations, and would make it more difficult for a federal station to identify an interfering amateur station. In addition, NTIA is concerned about the aggregate equivalent isotropically radiated power from multiple amateur stations transmitting within a single 2.8 kHz channel. Accordingly, NTIA requests that 47 C.F.R. Section 97.303(h) continue to require that amateur stations transmit only on the five center frequencies allocated to the amateur service.

I look forward to the resolution of this item which will allow the possibility of additional interoperability between federal and amateur service stations. Mr. Stephen Veader (202-482-4417; sveader@ntia.doc.gov) is the NTIA point-of-contact on this issue.

Sincerely,



Karl B. Nebbia
Associate Administrator
Office of Spectrum Management

⁵ The NPRM also proposed to apply this requirement to emission designator 60H0J2B (PSK31). However, to have a PSK31 signal transmitted on the center frequency, the control operator should not set the carrier frequency to the center frequency, but should instead set the carrier frequency 1.5 kHz below the center frequency (*i.e.*, the same method used to ensure that emission designators 2K80J3E and 2K80J2D are transmitted on a center frequency).