

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	FCC 12-121
)	
Amendment of the Amateur Service Rules)	
Governing Qualifying Examination Systems and)	WT Docket 12-283
Other Matters)	
)	
Amendment of Part 97 of the Commission's)	
Amateur Service Rules to Give Permanent Credit)	RM-11629
for Examination Elements Passed)	
)	
Amendment of Part 97 of the Commission's Rules)	
to Facilitate Use in the Amateur Radio Service of)	RM-11625
Single Slot Time Division Multiple Access)	
Telephony and Data Emissions)	
)	
Request for Temporary Waiver)	
)	
Amendment of the Amateur Service Rules)	WT Docket No. 09-209
Governing Vanity and Club Station Call Signs)	

REPLY COMMENT OF THE CODEC2 PROJECT

January 15, 2013

We note with some surprise the lack of opposition to our – we would have expected – controversial comment, one week before the close of the reply comment period. Because our comment was filed only under RM-11625 rather than the other 4 numbers that refer to this proceeding, the reader might miss it. We thus point out that one can view it at <http://apps.fcc.gov/ecfs/document/view?id=7022090358>

We would like to correct errata and lacunæ in our comment:

Paragraph 48's "all interested person" should of course be "all interested people".

In the large table in Paragraph 79, a band segment that should be 14.15 – 14.35 MHz appears as "1.150 – 14.35 MHz".

In Appendix B, we omitted the modulation designator for the FreeDV program. This would be 1K20J2E under current regulation, and we believe it should be 1K20J2D with the assumption (which we promote) that all digital modulation should end with "D" regardless of content.

The specification in Appendix B does not fully describe the over-air form of the varicode character set. The complete algorithm for encoding and decoding it, in source code form, is at

<http://freetel.svn.sourceforge.net/viewvc/freetel/fdmdv2/src/varicode.c?revision=1155&view=markup>

The specification in Appendix B does not attempt to fully describe our voice codec algorithm. At present the only complete description is its source code, which can be found at

<http://freetel.svn.sourceforge.net/viewvc/freetel/codec2/src/>

We respectfully submit this reply comment for the commission's consideration.

The Codec2 Project

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