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Public Comments on Amateur Service Rules:=====

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In response to proposed rule changes in FCC 2010-0019-001 with regard to limiting clubs to only one call sign assignment, I would respectfully request that the FCC reconsider this position.

The Florida Digital and Wireless Society (FDAWS) sponsors a number of interconnected repeater systems that uses

D-STAR digital technology. Each repeater system or control station requires a unique call sign since D-STAR utilizes the call sign as part of the system routing scheme. This is similar to the TCP/IP routing system used with a computer network. No two computers on the network can have the same IP address without network contention. D-STAR technology is similar in that each call sign used is assigned a unique IP address. Taking these technical reasons into consideration it is currently possible to operate a complex network in one of two ways.

1. One club trustee, with multiple club call signs
2. One club, with multiple trustees each assigned a unique club call sign.

In order for the trustee to be able to use the system himself, the system call sign must be different than his own primary station call sign, since his primary call sign is also assigned a unique IP address.

While we understand the intent of the proposed rule change to prevent "call sign hoarding" by some individuals, we respectfully request that the FCC reconsider the proposed change. Furthermore, we would suggest that a limit of no more than ten (10) call signs be assigned to one club. This would continue to allow systems like ours to operate and yet address the spirit proposed rule change intent.

Respectfully submitted,
George E. Jones, W4AQR

Trustee - Florida Digital and Wireless Society - KJ4ARB