

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

Amendment of Part 97 of the )  
Commissions Amateur Radio )  
Service Rules to Permit Greater ) RM-11708  
Flexibility in Digital Data )  
Communications )

To the Commission:

**COMMENTS OF JAMES EDWIN WHEDBEE**

The undersigned, JAMES EDWIN WHEDBEE, pursuant to Sections 1.41 and 1.405 of the Commission's rules (47 CFR Sections 1.41, 1.405) respectfully offers these comments in support of ARRL's Petition for Rulemaking ("Petition").

1. ARRL is correct that the symbol rate regulations governing amateur radio service digital communications modes are obsolete and long-overdue to be dispensed with by regulation only of permissible bandwidths.

2. Therefore, I unreservedly concur with the proposed rules and respectfully suggest the Commission's adoption thereof at its earliest practical convenience.

3. To this end, I further respectfully request the Commission undertake consideration of regulating all amateur radio service emissions by bandwidth, rather than type of emission or symbol rate, such that on LF, the maximum bandwidths are 100 Hz; on MF, the maximum bandwidths are 8 kHz (AM double sideband); on HF through 29 MHz, the maximum bandwidths are 8 kHz (AM double sideband); on HF above 29 MHz and VHF, the maximum bandwidths are 20 kHz; on UHF to 928 MHz, except spread spectrum the maximum bandwidths are 6.25 MHz (standard NTSC analog television); on UHF over 928 MHz, except spread spectrum the maximum bandwidths are 20 MHz (FM analog television); on SHF, EHF, and higher bands, any bandwidth is permissible provided it is constrained within the amateur service allocations. The essence of amateur emission regulations of where digital and voice/image emissions are in relation to one another within a particular set of privileges by operator license class may be retained even while changing emission-based regulations to bandwidth-based regulations.

WHEREFORE, the undersigned respectfully suggests adoption by the Commission of the ARRL's proposed rules and, further, the suggested bandwidth-based regulations above in lieu of emission-based regulations when in the Commission's mind it is convenient and appropriate to do so.

November 21, 2013

Respectfully submitted:



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