

2-December-2013

Re: RM-11708

Dear Sirs:

As a long-standing member of the ARRL, I wish to strongly object to (a) the current proposal as stated; and (b) the implication that it was submitted with full understanding and support of the general membership.

The proposal as currently stated, specifically in regard to the change in allowed bandwidth, poses a definite danger to all amateur radio operators who wish to continue operating in the lower band segments heretofore relegated to CW and digital modes. While I certainly support efforts to allow experimentation and development in our hobby, this should never be at the detriment to currently successful and widely-enjoyed operating practices. This proposal would allow broadband (2800 Hz BW) signals to be introduced into the amateur band segments that are now used for narrow-band modes (CW, RTTY, PSKnn, JTmodes, etc), all of which generally utilize bandwidths of 500 Hz or less. It would essentially remove all amateur radio spectrum allocations by bandwidth, a practice that has been superbly successful for all of the 60 years that I have been enjoying this hobby.

Furthermore, as I have come to understand, this proposal would also allow the use of proprietary, non-open-source protocols, which is effectively the same as allowing a form of encryption. It would prevent identification of interfering or unlawfully operating stations unless one has purchased a licensed modem capable of decoding the signals. This seems to be not only illegal under current regulations but also is certainly counter to all traditions of amateur radio!

I submit that this proposal should be either retracted by ARRL or denied by the FCC. Should the ARRL wish to pursue these efforts at rule change, they should then first open the discussion to ALL of their membership, clearly explain all issues and objectives, and obtain a consensus among members prior to re-submitting another proposal.

Respectfully,

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