

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

In the Matter of)
Amendment of the Commission's Amateur) **RM-11708**
Radio Service Rules to Permit Greater)
Flexibility in Digital Data Communications)

To: The Chief, Wireless Telecommunication Bureau
Via: Office of the Secretary

COMMENTS ON PETITION FOR RULEMAKING

1. In Petition for Rulemaking RM-11708 ("PFR"), you are being asked to initiate a rulemaking aimed at relieving our amateur service *of outdated, 1980s-era restrictions that presently hamper or preclude Amateur Radio experimentation with modern High Frequency (HF) and other data transmission protocols*. The petition proposes *to establish a bandwidth limit of 2.8 kilohertz for Amateur data emissions below 29.7 MHz*. Mixing narrow modes such as CW, PSK31, JT65 with wide data modes such as Pactor 4, as proposed by RM-11708 will cause severe interference to amateurs who are communicating with narrow modes.

For example, on the popular 20 meter amateur radio band, PSK31 operators commonly set their transmitters to 14.070 MHz. Each signal has a bandwidth of 31.25 Hz, and each individual "conversation" is closely spaced, so that all PSK31 signals on 20 meters cover about 2.8 kilohertz total. PSK31 operators typically run low power (about 30 watts). A 2.8 kilohertz bandwidth data station running legally permitted higher power could cover the entire portion of the 20 meter band used for PSK31 operation and cause severe interference to all PSK31 operators "one hop" via the ionosphere from the transmitting antenna. A similar problem exists for the narrow mode JT65 operators (transmitter frequency of 14.076 MHz). CW and RTTY operators that are trying to "work DX" cluster around the frequency where the DX station is calling, and would experience interference from a 2.8 kilohertz data station that started transmitting near them.

I expect that removing symbol rate references will promote experimentation and increase the usage of 2.8 kilohertz data modes on amateur bands. Concurrently with promoting increased usage, regulations should be changed to segregate modes based upon bandwidth. In fact, current regulations separate voice (wide bandwidth) from CW and RTTY (narrow bandwidth), so there is regulatory precedence for separating wide modes from narrow modes.

2. Please **REJECT** petition RM-11708.

Perhaps the ARRL should be encouraged to solicit inputs from all of its members, and come up with a modified proposal that separates narrow bandwidth modes (such as CW, RTTY, PSK31, JT65) from wide bandwidth modes (such as SSB and Pactor 4). In fact, I would support a modified proposal that deletes all symbol rate references while also defining sub bands for modes based upon their bandwidth requirements.

Respectfully submitted,
James Kajder
AF5FH
FRN 0005128012
ARRL Member
December 8, 2013