Proposed Rule Making: RM-11708

Dear Sir/Madam,

The Commission currently has before it a Proposed Rule Making, RM-11708. This RM asks the Commission to extend the symbol rate which may be used for digital communications within the frequency spectrum allotted to the amateur radio communications services. I strongly encourage the Commission to act favorably on this RM for several reasons:

- Safety Enhancement – The use of higher symbol rate, error-correcting digital modes enhance communications involving individual or group safety. This has frequently been demonstrated during both actual and exercise emergency communications activities. Digital signals frequently achieve a complete and accurate communication where voice communication does not or cannot. The potential positive emergency communications impact here in the Gulf Coast Region based on recent experiences with hurricanes Katrina, Rita, and Ike; thoroughly convince those of us involved in emergency communications (ECOM) planning of its value.

- Stimulates Experimentation – The growth of digital capabilities has stimulated wide ranging experimentation in how they may be used in various frequency bands. The growth of VHF and UHF digital communications led to many breakthroughs in digital communication which are now being further adapted and utilized in the HF frequency bands by military and government communications groups. Extending this capability into the amateur radio frequency bands will serve to stimulate and educate the additional development of these capabilities.

- Impose Greater Order – Current use of much of the digital technology on the amateur radio bands does not clearly define specific frequency segments for the use of most newer digital technology. Implementation of RM-11708 offers an opportunity to encourage higher speed digital development and use while ensuring lower probability of interference with current amateur operating modes.

I have personal experience in the use of high speed Pactor and higher bandwidth digital mode operation through my involvement in Navy-Marine Corps MARS and the SHARES Communications programs. Within these programs we successfully pass high speed digital traffic on a daily basis as part of our training and readiness for ECOM operations. The recent development and extension of the Winlink Radio System and the extension of its capability to now pass error free message traffic over extended distances on a radio only basis can serve as a primary example of the value that such a system offers. Extending this capability into the Amateur Radio Emergency Services (ARES) and Radio Amateur Communications Emergency Serves (RACES) programs could also prove to be of major value.in an emergency that disrupts normal lines of communications.

I strongly encourage the Commission to act favorably on this rule making and to extend or encourage development of high speed digital communications capability within the amateur radio service.

Respectfully,

/s/ Godik C. Gyldenege

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