

670 Old Airport Road
Auburn CA 95603
13 Dec 2013

Subject: RM-11708

To the Commission:

I currently hold an Amateur Extra license [K6DGW] and have for 60 years this month. I have been a member of ARRL for most of that time except for 4 years in combat in SE Asia. I recognize them as Amateur Radio's primary advocate before the Commission, and while I have disagreed with them occasionally, by and large, I find their advocacy to be in line with my positions.

Please register my support for the ARRL Petition for rule making RM-11708. Since all US amateur allocations are shared between all of us with no one having a preferred or granted right to a given frequency range, and the MF and HF spectrum allocated to amateurs is highly limited given the number of operators who desire to use it, occupied bandwidth is always a huge concern.

The symbol rate limit of 300 in 97.307(f)(3) was tantamount to a bandwidth limit for data emissions in the 1980's. That is no longer true since a number of modulation schemes [e.g. OFDM among others] allow one to reduce the symbol rate as low as desired while still maintaining high net throughput with very wide bandwidths are now feasible. These methods have the added advantage of being nearly immune to narrow-band interfering signals such as CW and RTTY FSK, and they would likely become attractive to some. Those kind of bandwidths have no place on shared HF amateur bands. Unfortunately, as pointed out by ARRL, absent the bandwidth limit implied by the symbol rate limit, there are no other bandwidth limits at all in place for the CW/RTTY/DATA sub-bands at this time.

A "hard," specific limit on bandwidth makes much more sense in 2013. A limit of 2.8KHz as proposed in the Petition seems reasonable. PACTOR-III is in common use today with a nominal occupied bandwidth of 2.2-2.3KHz. 2.8KHz will thus not stop the use of a mode used currently by many Amateurs. PACTOR-IV, currently prohibited by the symbol rate limit, would be permitted since it's nominal occupied bandwidth is around 2.4KHz. And, 2.8KHz is the bandwidth limit in the five channels in the 60m band, and nominally the bandwidth of a normal SSB signal, so it's not like there isn't a precedent. New, wider, more spectrum-hungry modes would then be forced to the VHF/UHF bands where they make sense and there is much more available spectrum.

In conversations with other amateur radio operators over this petition, there seems to be a belief, not supported by 47CFR97, that there are CW-only sub-bands, and that granting the requests of this Petition will inundate them with 2.8KHz wide data signals. That is not true of course, there has been nothing in your regulations that would have prevented that already, and it hasn't happened. As a lot, we are pretty good at self-segregating by mode on our shared bands.

Again, I urge you to adopt the ARRL Petition RM-11708.

Sincerely,

Fred Jensen K6DGW