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The FCC should reject ARRL Petition for Rulemaking RM-11708.

The ARRL proposal will exacerbate an already unacceptable situation on the HF digital Amateur Radio frequencies. The problem is that stations in unattended operation begin transmitting on a frequency, sending a long text file, without checking to see if the frequency is occupied. These unattended stations are about 2.4 KHz wide, obliterating a whole bunch of people using narrow 300 Hz modes. The text files are typically emails from yacht owners who choose Amateur Radio to avoid the fees associated with the more appropriate commercial networks, such as Inmarsat or Iridium.

If the available bit rate is increased, yacht owners will find Amateur Radio to be an even more attractive option for email. Email by Amateur Radio for free sure beats using a commercial provider who will charge for the service. The higher volume of 2.8 KHz email over the amateur band will cause more and more disruption to the large and rapidly-increasing number of narrow-band individual users.

Many times I and other users of narrow-band modes, such as RTTY, have been blown off a frequency by a big, wide, unattended station transmitting an email. The ARRL proposal would make the situation even worse.

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