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In the notice filed by the ARRL, no accommodation or consideration has been made for existing users of the CW/data subbands. Their proposed wideband data emission is entirely incompatible with the existing modes being used there.

It is blatantly obvious that the ARRL is attempting to legalize wideband data emission modes at the expense of CW and weak signal data operators (PSK-31, et al) to further their Emcomm/Winlink and maritime ham radio email agenda. They even go so far as to say no phone or image operations would be affected, so as not to attract the attention of that potentially vocal group of operators. It's no surprise that Emcomm and sailing enthusiast groups are heavily promoting the support of this PRM so they may use their commercial Pactor modems to turn the HF bands into free long haul email and internet.

[http://www.clarc.org/index.php?option=com_content&view=article&id=314:support-rm-11708&catid=23:operations&Itemid=33]

"...The further development of even faster protocols in the same bandwidth limitations depends on the success of this rulemaking. Steve, k4cjx For the Winlink development team"

[<http://www.sailnet.com/forums/general-discussion-sailing-related/111746-us-citizens-urged-support-fcc-rm-11708-a.html>]

"...Sailmail has updated their systems on the marine bands to P4. Many Winlink stations outside the United States have as well. Only the US continues to limit progress by using the archaic restriction of symbol rate. Approval of this proposed rulemaking will make Pactor 4 available to cruisers in the US, and encourage continued development of new and faster data protocols and digital voice on the ham bands...."

The text of this filing goes into great detail as to the justification of the change based on history and the current definitions of data, baud and symbol rate and how much "better" data modes would be by simply specifying a maximum bandwidth. On the surface that is a rational position but the PRM offers no indication or remediation of the interference impact putting these wideband data stations in a subband where the predominant operations are CW and weak signal data modes. To offer the entire CW/data subband to a disproportionately few operators and commercial interests at the expense of many both within and outside the United States is improper at best.

While an update of the amateur service mode definitions and emission designators could be addressed, and possibly an allowance made to conduct wideband data mode operations in specific segments of the the amateur subbands, the League's PRM as submitted is too inspecific, pervasive and damaging in its current form. I see little difference between this and the "regulation by bandwidth" proposal (RM-11306) by the ARRL in 2005 and subsequently withdrawn after outcry from amateurs at large. The fact RM-11708 pertains only to digital modes does not change the validity of the Leagues' petition this time around.