

I am in opposed to RM-11708.

I do not believe that removal of the symbol rate limitation from Part 97 would be in the best interest of Amateur Radio service. Even though the ARRL has solicited the FCC on behalf of this change, they really do not represent the whole of Amateur Radio.

As the growth in Amateur Radio has been wonderful over the most recent decades, it has created a much larger demand for frequency allocation. Enabling a 2800hz or removing the 500hz symbol rate limitation within the CW or other digital portions of the HF bands would further increase or compact the utilization of these frequencies.

I know that the advancements in digital modes could possibly serve some emergency communications needs within the VHF allocations. However wide band digital HF traffic would mostly service a few maritime amateurs and those trying to move large data files of non-emergency nature nationally/internationally.

HF wide band digital communications should not come at the expense of compromising those long standing modes within our service. Should the PSK31, JT65, JT9, Packet, RTTY, CW and other modes be over taken by automated wide-band modes? Those frequencies become unusable for other facets of Amateur Radio because those automated modes could/would start up on top of communications already in progress, causing interference within our service. Ours is a shared service among those licensed.

The developers of PSK, JT65, JT-9, etc have found ways to work within the limitation of a 500hz symbol rate limitation. Can't other digital mode developers do the same? Is that not what Amateur Radio is about, or is it easier to change the requirement under which we all operate?

The FCC is the governing body of the Amateur Radio Service, I hope that you will make a decision and ruling on this issue that will best govern all within the Amateur Radio service.

As a concerned Amateur I urge you to deny RM-11708.

Thank you!