(my apologies if this is a duplicate; I didn't get any kind of confirmation after I submitted this the first time)

Greetings,

After reviewing the ARRL's petition a few times and reading the many online discussions regarding its petition I can only say I strongly oppose to the ARRL's proposal, as written.

I am not against furthering the art and science of amateur radio and telecommunications in general, on the contrary; but if this proposal is made into law it will have a very negative impact on amateur radio communications. Not only in the USA; but on a worldwide basis, given the nature of HF communications and signal propagation.

In addition, and as far as I'm aware, the ARRL did not solicit its members for their opinions regarding this proposal. If it had I would have objected to it before it made it to your offices. They clearly want to apply their new rule (if it becomes rule) to what is nowadays commonly know as the "digital segment" of the HF bands, of which I am a very active user. Their proposal, if approved, would literally obliterate that segment; because one of their 2.8 kHz wide signals would wipe out hundreds, if not thousands, of the (often low-power) signals currently using that particular segment.

All of those users, if I may add, are using communication modes that are NOT "outdated", as the ARRL seems to imply. Most of those modes were developed in the past 10 to 20 years (and in the case of the JT modes much less!) and clearly demonstrate the current AND future state of the art in amateur radio technology, ie. doing "more with less" on the already overcrowded HF bands. Signals with very little bandwidth travelling much further with less transmitted power, all over the world, have become the norm in these HF band segments. And those signals fit in a very tight bit of spectrum, side by side, without interfering with each other. The ARRL, on the other hand, seems to want to do "more with more". I believe that that is a waste of bandwidth, that serves no one - except for a few users.

Which brings me to my next concern: the ARRL's proposal seems to be spearheaded by a select few, and NOT the average amateur radio operator. As I'm sure you've seen in some of the "in favor" comments this proposal seems to be aimed at legalization of PACTOR 4 and other (future) systems. Those systems, hardware and software licenses combined, are quite expensive, and totally out of reach of the average amateur radio operator. Only the weatlthiest of amateur radio operators can afford such equipment; and it would certainly be unfair to say that this proposal is "in the best interest of all amateur radio operators". It isn't, on the contrary.

My final remark regarding this proposal is based on personal experiences on the HF frequencies. Currently there are several transmissions on the HF bands that do not comply with the FCC rules, which say - simply put - : no one may interfere with an ongoing transmission. But: some of the stations on the HF bands do not follow that rule, either because of ignorance, or from a "don't care" attitude. Some of those stations, which the ARRL now wants to increase in number and expand in bandwidth, will start transmitting at any time of day, on any given frequency, whether the frequency is in use or not. In other words: they don't listen before they start transmitting, most likely because they are fully automatically controlled, with the "frequency in use" detection turned off. I believe that the ARRL with its proposal is only going to make matters much worse, by putting more of these wideband stations on the air - without anyone being able to even monitor who they are. Because, as I pointed to in my previous paragraph, only the wealthiest of operators would be able to afford the equipment to monitor those offending signals.

Once again: I strongly oppose the ARRL's proposal. It's not in the best interest of all amateur radio operators, and it will create even more (illegal) interference to communications. If there truly is a need for a bandwidth expansion then I suggest it be done ABOVE 30 MHz, where - according to what I've read in several of the ARRL's

publications - there is lots of room for such experiments; because "those bands are under-used".

Respectfully,

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