

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

My name is John Lockhart and I hold Amateur Extra Radio License W0DC. I have been an active amateur radio operator for 45 years and have utilized digital modes for more than 40 years. I am also a member of the American Radio Relay League (“ARRL”).

The ARRL submitted a “Petition for Rule Making” which was assigned FCC proceeding number RM-11708. While supportive of eliminating the symbol rate limitation and replacing it with a bandwidth limit, I am strongly opposed to the proposed bandwidth limit of 2.8 kHz for data emissions below 29.7 MHz as it is not in the best interests of the Amateur Radio Service.

The ARRL petition does not show justifiable cause for the need to set the bandwidth limit of data emissions to 2.8 kHz in the RTTY, data and CW portions of the amateur HF bands. This proposed figure appears arbitrary and higher than needed. For conversational (human-to-human) digital modes, 300 Hz to 500 Hz is more than sufficient bandwidth.

In addition to being excessive, the 2.8 kHz bandwidth limit appears to have been proposed to appease advocates of the Pactor series of digital communications protocols. The Pactor 3 and Pactor 4 protocols require proprietary software and hardware licensed for purchase from SCS-Spezielle Communications Systeme GmbH & Co. KG, Hanau, Germany (“SCS”). Without this proprietary software and hardware, the typical amateur radio operator cannot monitor a Pactor 3 or 4 transmission, a critical factor in determining the source of interference.

The ARRL demonstrated no valid reasoning for the proposed data bandwidth limit of 2.8 kHz in the RTTY, data and CW segments of the amateur HF bands. Approval of RM-11708, as written, would be damaging to the vast majority of amateur radio operators utilizing RTTY, data, and CW modes. The proposed 2.8 kHz bandwidth would only satisfy the few operators who want to send large amounts of email using automated stations while causing interference to the majority of users.

For the above reasons, I request that the Commission reject RM-11708.

Respectfully submitted,

John Lockhart W0DC
Roseville, Minnesota

December 21, 2013