

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
Amendment of the Commission's Amateur) RM-11708
Radio Service Rules to Permit Greater)
Flexibility in Digital Data Communications)

To: The Chief, Wireless Telecommunication Bureau
Via: Office of the Secretary

COMMENTS ON PETITION FOR RULEMAKING

I am in favor of the ARRL's petition. Its intent is good and is a good middle of the road approach for HF where spectrum is scarce.

[Quote]

"It is absolutely the intention of this Petition to facilitate increased experimentation with data emissions and to eliminate artificial regulatory barriers to such experimentation."

"Quite the contrary is true: at the present time it is permissible to use multiple carriers, each with multiple-bit-per-symbol modulation, necessitating large occupied bandwidths. The limit on data emission bandwidth proposed in the Petition would preclude that practice. "

[/Quote]

As stated in my first comments I filed on this petition; I do feel however, that above 30 MHz, a different set of rules or bandwidth limit would be a good idea. Above 30 MHz the band space not only exists, but sits fairly idle to support much higher data rates.

Restrictions on multiple carriers typically used in modern modulation techniques like spread spectrum, would be bad ,and against the stated intent of the petition above 30 MHz.

There is great un-needed inconsistency in the management of Amateur modulation modes. Examples include; the ongoing Time Division Multiple Access rule modification (2011), and wide variances in band-with limits between modes (6 MHz amateur television, vs 100 KHz for data).

Overall, I tend to agree with many observations of Bruce Perens petition (RM-11625). He points out, there are number of very narrow requests being submitted, that causes unnecessary burden to the FCC.

A major rule rewrite and streamlining is long over due in my opinion. Major confusion lies in the differences in rules between modes.

Examples: Is digital amateur TV an image transmission? Is it bound to the bandwidth rules spelled out for data transmissions? Do spread spectrum transmissions have to follow the data bandwidth rules?

The continuation of this rule piecemeal process, places severe regulatory hurdles and hinders the capability of Radio Amateurs to experiment and innovate.

The hardware such as Hack RF and other open software defined platforms exist to modernize ham radio. The rules are cumbersome and deture potential amateurs and small manufactures from stepping forward. A streamlining of the rules also has the potential to draw new blood to the hobby, capable of moving things forward.

Respectfully submitted,

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