

Reply to ARRL Comments on RM-11708

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In comments filed on 2013-01-07, petitioner ARRL states that

5. The opposition comments contain anecdotal reports of Amateur stations transmitting data communications on frequencies occupied by CW, RTTY or narrow-bandwidth data communications, and allegations that Winlink2000 stations that are unattended while transmitting PACTOR-3 emissions routinely disrupt ongoing communications in the RTTY/data subbands at HF. Even if these examples were verified and quantified, and even if the alleged problems were widespread in the HF bands, these incidents would not justify retaining the symbol rate restriction as a means of limiting data emissions in the HF bands. The reason for band plans in the HF bands is that the HF bands are limited and there should be cooperative accommodation for all types of operation. If there is a failure in this respect, it should be solved without reference to outdated Commission rules. Likewise, if there are abuses of the Commission's Section 97.221 rules regarding automatically controlled data stations resulting in ongoing interference, those should be referred to the Commission as enforcement matters.

The interference caused by automatic stations transmitting in the 97.221 subbands is not the result of abuse: when an automatic station transmits on a frequency that is already in use by other stations, its operator is violating no element of part 97. The interference caused by automatic stations operating in the 97.221 subbands is the result of two failures:

- No band plan has been established that would reduce the incidence of this interference.
- No action has been taken to encourage or motivate operators of automatic stations to deploy and enable "listen before transmit" capability, which would significantly reduce the incidence of this interference.

Petitioner's proposal would worsen this situation by allowing automatic stations to employ even wider signals than they can effectively use today.

This defect in petitioner's proposal could be corrected by limiting automatic stations transmitting in the 97.221 subbands to signals no wider than 2.2 kilohertz; such a limit would not prohibit any emissions by automatic stations currently in use. More constructively, this defect in petitioner's proposal could be corrected by limiting automatic stations transmitting in the 97.221 subbands to signals no wider than 2.2 kilohertz unless they incorporate and enable "listen before transmit" capability, in which case a maximum bandwidth of 2.8 kilohertz would be permitted; this would incentivize the operators of automatic stations to deploy and enable "listen before transmit" capability, reducing the incidence of interference from automatic stations.

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