

To: the Federal Communications Commission in the matter of RM-11708

From: Matthew Pitts N8OHU

Esteemed Commissioners,

In the matter before you there are many viewpoints being expressed; I myself have previously commented on several occasions in this matter. This comment, being posted to the website after the end of the reply comment period may well be ignored, but I feel compelled to post it anyway.

One thing seems clear to me; change is inevitable, and change, especially one that is a long time in coming, such as this one, is resisted, often with emotional responses instead of logically thought out reasons why the change being resisted is bad for people. Many people responding see the removal of a long obsolete data rate limit and replacement with a maximum bandwidth limit as an attack on their chosen methods of digital communications rather than a recognition that the US is far behind the rest of the world in modernizing their Amateur Radio Service rules. Even those that do seem to recognize this do not understand that we, as the second most numerous Amateur Radio Service in the world (only Japan has more licensed Amateur Radio Operators) and that by retaining the slow speeds, we are in fact holding back the advancement of Amateur Radio in the rest of the world.

Many of the opponents point to interference from Automatically Controlled stations during times of high activity called Amateur Radio Contests as an example of why there should be no change; what many of these individuals fail to point out is that in many of those cases, they have moved into the bands that were designated by the Commission in a 1995 ruling for the use of such automatically controlled stations. Others point to these same incidents as reasons to limit the bandwidth to 2.2 kHz unless these stations use busy channel detection schemes to ensure that they do not interfere with users already transmitting; while a noble idea, there may be reasons that the automatically controlled stations do not use it that the people that insist on it do not know about. One such reason is that the detection algorithms can be tripped by power line interference; another is that in the case of narrow bandwidth activity in the automatically controlled band segments triggered by contesting, such busy channel detection can effectively shut down an automatically controlled station that would otherwise be able to assist a marine vessel in distress, much like the incident with the HMS Bounty during Hurricane Sandy. That there was only one life lost in that tragic incident is a testament to the effectiveness of the Winlink 2000 system, which is but one of the beneficiaries of a long needed change in our rules regarding data rates allowed on HF. Winlink 2000 is also a major component of the Emergency Communications plans of a vast majority of the states in this nation; in those that it is not the primary tool, it is still used, as the more tools we Emergency Communications operators have, the better we can provide for the needs of the agencies we serve and the people that those agencies assist in times of disaster.

Some comments have implied that the ARRL, who represents all Amateur Radio Operators in the US, whether they are a member of the organization or not, does not speak for all hams, and point to the previously filed petitions that have been rejected on this same subject as proof; I do not believe that. I believe that there are many that have never taken the time to participate in the comment process that would support this change and would have each time it has come up; that it has failed in the past indicates to me only that enough people have opposed it and taken the time to participate in the process to give the indication that it is overwhelmingly opposed. There are even those that think that because it's worked for 80 years, the system is perfectly fine and doesn't need changed, or they think that wide bandwidth data should be mixed in with Single SideBand Voice, like is currently done with Slow Scan

TV, while ignoring the critical difference between SSTV and Digital Data such as utilized by Winlink 2000.

Some very technically minded individuals have brought up the issue of the requested data limit of 2.8 kHz and have said that a lower limit such as 2.2 kHz would be more workable, since it is the actual bandwidth of a Pactor 3 or Pactor 4 signal; while this is technically true, why should this be implemented instead of the wider bandwidth requested, since this may well make it more difficult for those planning to develop more open, higher speed digital modems, which is a stated objective in the initial submission from the ARRL. I know of at least one developer that is waiting for this change to be approved before working on an update to his existing digital modem, and I'm sure there are others that would like to not only get started coding them, but be able to legally proceed with over the air tests of their work; not only that, but there are many existing modems for VHF use that could be used on HF except for the fact that they have a data rate that exceeds the current limit.

Respectfully,

Matthew D. Pitts
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