Dear Commissioners:

I am pleased to offer these ex-parte comments and urge the Commission's consideration of this filing. I am an Electrical Engineer specializing in communications and software and have been a licensed amateur radio operator since 1966. I also hold a FCC General Radio Operator's (formally First Class Radiotelephone) license.

In the past, the ARRL, as the chief lobbying organization of the amateur radio service in the USA, has maintained constant vigilance and taken decisive actions to protect the amateur radio spectrum from outside commercial services. I commend the ARRL for their successful past efforts in defending the amateur radio spectrum.

One such recent attack on the amateur spectrum was from the outside interests wanting to provide Internet Services using Broadband over Power Lines, BPL. The ARRL?s position was clear, ?BPL represents a potential for interference that is almost without precedent. ?. (Ref: http://www.arrl.org/broadband-over-powerline-bpl)

The ARRL through RM-11708 is now promoting Internet Services inside the amateur radio bands. Where in the past, concerns were about outside BPL interference to the amateur radio spectrum; we now have an ?interference threat from within our spectrum? as proposed by the ARRL through RM-11708.

In addition to the spectrum threat from within, there are other fundamental questions that we need to ask ourselves like does ?Internet as a Service? belong inside the ham bands? I recognize that a small percentage of amateurs are involved in EMCOMM that may have occasional needs for Internet Services but is providing free Internet services to yachtsman so they can send email and update their facebook page really what amateur radio is about?

Another fundamental question is that of transparency. Current, waveforms like PACTOR and DSTAR contain proprietary components and are not decodable by the general public. With RM-11708 many new waveforms will be used some of which will be proprietary. How can the FCC and the ARRL Official Observer program work with waveforms that are proprietary? When a real emergency happens, how can operators know to standby and keep a frequency clear for emergency traffic if no one knows what is being transmitted? These issues further demonstrate that RM-11708 is flawed and not vetted out.

The ?interference threat from within? is simple, RM-11708 introduces a new wider band digital amateur radio modes and promotion of their interests while ignoring the needs of the incumbent narrow band users. The approach detailed in RM-11708 is terribly irresponsible as it only addresses wider bandwidth requests from a very small group of the users while ignoring the interests of many narrow band users of amateur radio.

In addition to just a bandwidth mismatch, RM-11708 will allow new waveforms that are designed to ride roughshod over narrow bandwidth waveforms (CW, RTTY and PSK31). For example, STANAG specs claim as much as a 40dB advantage over narrow-band-interference advantage (Ref: Johnson, et al.,Third-generation and Wideband HF Radio Communications, p. 32.)

The ARRL and FCC should immediately revoke RM-11708, as is does not simultaneous address all constituencies/users of the spectrum and is not vetted out. The ARRL must "go back to the drawing board" and practice standard spectrum policy, which is to work out a solution that offers all of the stakeholders of the same spectrum an opportunity to ensure a unified approach to minimize interference and to allow an efficient use of shared spectrum.

Sincerely,

Terry D. Gerdes,
AB5K