

Dear Commissioners:

As an active radio amateur, N9NC, I respectfully request the Commission's consideration of this brief ex parte comment for RM-11708:

I strongly believe RM-11708 as currently proposed should not be implemented; it is not technically sound and does equitably address valid concerns of all the affected stakeholders, in particular, incumbent users of narrow band modes would be materially disadvantaged, were the rule making to be enacted.

I've been an active and avid ham for nearly 4 decades. Amateur Radio sparked my interest in mobile communications, I was fortunate to help build the first digital cellular networks in Russia, Hungary, and Egypt. As CTO, I lead the engineering and operations of several large and complex networks that provided the first phone calls, ever, to millions of people.

While in those roles, I oversaw a number of frequency coordination issues in sensitive border areas. I learned that while spectrum management and planning can be complex, there are two obvious, basic, concepts borne of that experience:

- 1) Avoid interference. Don't transmit on the same frequency as someone else. That's the definition of interference.
- 2) Work with the relevant stakeholders to find solutions to avoid interference.

These ideas are so obvious it seems absurd to state them.

Yet, RM-11708 has missed these points entirely.

The crux of the matter has been concisely stated by Dr. Ted Rappaport, cited here with permission:

"The technical reality is that this new RM petition, if it is to be introduced, must solve the protection of CW and narrowband signals at THE SAME TIME it introduces its proposed changes, for the simple fact that this all involves the SAME SPECTRUM used by different bandwidth users at the SAME TIME.

This is not rocket science. It's spectrum planning 101."

The ARRL clearly thought outside a box that existed for decades to manage these basic issues in the 40 meter case. That excellent work resulted in the successful migration of most wideband short wave broadcast stations from the Amateur 40 meter band. Interestingly, the core problem was identical to the current matter: wide-band and narrow-band modulation can't co-exist in the same frequency band at the same time.

I urge that RM-11708 be denied, and respectfully suggest that the ARRL and its HF Band Planning Committee create a new proposal, crucially, together with all stakeholders, to address concerns of both existing users of narrowband modes such as CW, RTTY, and PSK, and users interested in new, innovative digital modulation techniques.

Thank you for your consideration of these comments.

Sincerely,

Thomas Poland N9NC