

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

In Regards To: )  
)  
Amendment of Part 97 of the Commission's ) RM-11708  
Amateur Radio Service Rules to Permit Greater )  
Flexibility in Digital Data Communications )  
)

To: Chief, Wireless Telecommunications Bureau

Via: ECFS

I support eliminating "regulation by symbol rate" for data emissions in band segments where CW, RTTY, and narrow bandwidth data communications are now allowed. However, as noted in the American Radio Relay League's (ARRL) comments, recommend a 2.8 kHz bandwidth limit be imposed as a minimum/more viable substitute.

Eliminating regulation by symbol rate and substituting a 2.8 kHz bandwidth limit would support a balanced approach to spectrum utilization while allowing greater experimentation and development of new operating modes. The Federal Communications Commission (FCC) has made it clear the Amateur Radio Service community must police itself within the sub bands. Thus far the concept has worked and the adoption of a 2.8 kHz bandwidth limit would require greater adherence to such. But eliminating the current regulation by symbol rate WITHOUT substituting ANY bandwidth limit would be disastrous.

Perhaps by establishing a 2.8 kHz bandwidth limit substitute now, a more critical bandwidth concept for specific modes can be proposed/implemented later. Encroachment is nothing new, but, if the symbol rate is removed and no limiting bandwidth substitute is put in place, then in time the band segments currently used for CW and RTTY will be destroyed due to all the additional wide signals.

//signed-gel-27 March 2014//  
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