

## Comment in regard to RM-11708

RM-11708 should be rejected. There are several reasons for that action to be taken.

1. RM-11708 addresses the promotion of experimentation with higher symbol rate digital communications within the Amateur Radio service in the narrow bandwidth cw and digital sub-bands by overturning the existing symbol rate restriction and instituting a maximum allowable bandwidth. Unfortunately this requested bandwidth, which is large enough to accommodate analog voice communications, would allow high symbol rate digital transmissions which are extremely dense and thus highly likely to present preclusive interference to the lower symbol rate narrower bandwidth modes (usually one tenth or less of the 2.8 khz bandwidth requested) now existing in the cw/digital sub-bands. This interference is inevitable since the so called automatic transmissions often used by the wider digital modes have proved to be incapable of determining if a frequency is already occupied by other transmissions, and proceed to interfere with ongoing communications. A solution to this problem is to place any digital modes which exhibit a bandwidth in excess of 500 hz either within the current wide bandwidth modes segments, i.e., the SSB or phone segments, More thought and fact finding needs to be put into any rulemaking that involves such a significant change in regulation. Therefore RM-11708 should not be adopted.

2. The applicant for RM-11708, the American Radio Relay League (ARRL), formulated the specifics of this RM at the request of and with information supplied by a very limited number of interested parties, some of whose interest may be based on pecuniary reward or illegal use of the Amateur Radio Service. It was only after the filing of RM-11708 that any attempt was made to appraise the opinions of the membership of the ARRL in regard to the desirability of RM-11708. Once a significant number of members had raised their objections, the ARRL's reaction was to tell the objectors that they did not understand the changes requested. Many of the objectors to RM-11708 are likely to have an equal if not better understanding of the technical ramifications than the persons who created the RM-11708 document. Thus, RM-11708 should not be adopted, and the ARRL should be advised to involve more of its membership in the substance of a request for rule making that addresses the problems more equitably.

3. One possible motivation for some of the supporters of RM-11708 is that its adoption would make legal within the amateur radio service the operation of a communications system (Pactor 4) which could provide amateur operators in geographical areas unserved by landline access to internet providers the opportunity to access the internet in a manner proscribed by FCC regulation, i.e., to circumvent commercial internet links provided for this specific purpose.

4. Adoption of RM-11708 would make legal communications systems that would allow the users of such systems to be unidentifiable on the air because of proprietary encoding unavailable to Amateur operators, precluding their creation of software or devises which would allow such identification without the purchase of such software or

devises from the developer of such systems. This is contrary to the spirit and the letter of Amateur Radio regulations.

5. The volume of conflicting responses to RM-11708 should by itself raise the question of the advisability of its adoption. A perusal of the content of the many comments filed will show that the reasoning of those comments opposed to RM-11708 is at a much higher level than the often simply copied "I agree with RM-11708" that represents so much of the supporters comments.

Respectfully submitted,

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