Comment on RM-11708

In the interest of showing my qualifications for making these comments I am a degreed Electrical Engineer, licensed Amateur Radio operator for 48 years, former Chief Technology Officer of both the Integrated Electronics System Sector and the Home and Networks Sector of Motorola, former member of the United States Department of Commerce Electronic Instrumentation Technical Advisory Committee (EITAC) and holder of 19 US Patents related to communications. I am also a Life Member of the American Radio Relay League.

I oppose RM-11708 in the current state.

It simply does not maintain the narrow bandwidth requirements that the CW and RTTY Amateur segments were intended to have and opens them up fully to wider bandwidth signals which are not compatible.

I would like to see rule making that does include more up to date regulations on data signals with bandwidth rather that baud limitations as well as allow for appropriate experimentation in data but that does not require opening the entire CW and RTTY bands to 2.8 KHz wide signals which are incompatible with the current usage of those segments. The current rules should be modified to accommodate current and future technology but this proposal falls short of adequately doing that while insuring the protection of the narrow band modes.

RM-11078 should not be considered favorably unless modified to allow only 500 Hz maximum bandwidth signals in the narrow band areas or have clear segments for wider band data modes which still allow substantial separate segments for the narrow bandwidth modes. Voluntary plans to do this type of segmentation particularly for modes of very different bandwidths have not worked well in practice and should not be considered a viable solution.

Respectfully submitted,

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