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I am writing in opposition to RM-11708, the ARRL proposal to eliminate the symbol rate limit. I am an amateur radio operator primarily active using the CW and RTTY modes, and I feel that adoption of RM-11708 will have a severe adverse affect on those operations in the amateur bands.

Elimination of the symbol rate limit will have the effect of mixing relatively wide-bandwidth (2.8 kHz) signals with current narrow band (less than 500 Hz) signals in the amateur CW and Digital subbands. This is bound to cause undo interference to narrow band users, as was noted by the FCC itself in the following footnote from FCC 06-149, released October 2006:

"Separation of emission types by bandwidth minimizes or reduces interference because it protects narrow signals from interference from wide signals. Amateur licensees have accepted this division of spectrum as a method for minimizing interference for as long as the amateur service has been regulated ..."

Also, current automatic stations already cause interference to CW and RTTY operations because the automatic data operations do not have effective "channel busy" detectors to prevent interference to other users. Such interference will certainly worsen if wider (2.8 kHz) bandwidths are permitted in the CW and digital subbands.

The only immediate use for these higher symbol rates/wider bandwidths would be to allow operation of a private internet access system that would in effect permit users to bypass satellite or commercial maritime internet access charges. The protocol I am referring to is PACTOR 4, which uses encryption and can not be decoded by individual users or ARRL Official Observers without spending several thousand dollars on proprietary hardware. This strikes me as an inappropriate use of the amateur bands and precludes self-policing efforts.

I would suggest the Commission reject RM-11708 and consider changing the rules to limit the bandwidth to 500 Hz in the CW/RTTY subbands. Wide-band data signals should be confined to those subbands that already permit wide-band signals (i.e., the phone subbands).

Respectfully,

Arliss Thompson