

My concern is that, if accepted totally or in part, the following practical considerations could be overlooked. I trust that the FCC technical staff is fully aware of these issues and are planning to properly deal with them. Regardless of whether all, part, or none of this filing is placed in force.

1. Narrow band (less than 500 Hz) communications, especially those using minimal power, need frequency protection. Not mere "band plans", but enforceable sub-band allocations. The proposed bandwidth increase to 2.8 kHz should be severely limited by frequency, or else placed where it is most compatible -- the SSB sub-bands. Such is the case currently with wideband analog and digital SSTV. A long held amateur mandate of minimum bandwidth and minimal power is thriving with modes such as PSK31, JT65, and even with low-power FSK and CW. Wide-band modes, that advertise themselves as able to resist interference from other modes, are not compatible with narrowband.
2. De facto unattended operation, should be channelized and moved to areas that present the least chance for interference to other communications. The excuse that a control operator at one end of a path -- interrogating another distant station -- suffices as being the control operator of that second station is flawed, and unworkable. Such operations on VHF/UHF are understood and allowed. Worldwide propagation on HF, such as the 20m band, makes such operation tantamount to deliberate interference. Most other bands, even 20m, could accommodate such operations just below the SSB sub band. Realignment and movement upward of the lower end of the 80m phone allocation could provide additional space on that congested sub-band below 3.6 MHz. as an example.
3. Considering the advanced state of digital technology, ANY encryption techniques that require amateur operators, or the FCC, to purchase and utilize proprietary (\$\$\$) hardware to decode/monitor, should not be allowed. Software should be open source. This is critical for providing the means for the amateur service to continue to self-regulate. No commercial interest should have such advantage or influence. (This concerns monitoring and decoding only. Not necessarily encoding and transmission ability.)
4. Increasing allowable bandwidth to 2.8 kHz is a step in the wrong direction. Unless, of course, those modes are moved to the SSB sub band.

These observations are presented for your consideration in acting upon RM-11708.