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Regarding RM-11708 to eliminate the symbol rate limit. I am former Sr. Manager of Worldwide Technical Training at Motorola, Telco thru microwave systems engineer, Chief HF Consultant of Motorola, Chief HF Advisor to Nat'l Guard Bureau, long term MARS member and HQ NG MARS OIC - WI (was practically raised in the HQ SIGNAL CORPS MARS station which my Dad, W5EWF founded) and am the author of several HF systems books. Also a ham (WA2KBZ) over 50 years. Also am an FCC First Class Radiotelephone (now General) license holder with time at sea and in broadcast.

I oppose this ARRL proposal. Grounds include interference to other modes of use in ARES/CD/RACES and other emergency operations. The abuse of operating quasi-commercial email operation on ham bands, mostly for maritime use, the inability to ID many Pactor signals w/o Pactor equipment, and the existing encroachment on CW frequencies by data and SSB as it is. A growing resurgence in QRP (low power) simple equipment as kits or home built/designed projects that use CW primarily would likely be overwhelmed by wide band signals negating this desirable trend in low power and battery/field equipment so useful in many recent long term power outages. I conducted long term studies at Motorola (as KS2XIK and XIJ) and am well versed in the use of FEC/ARQ, packet, etc. on HF. Their slow throughput per unit time of spectrum usage is detrimental to other more efficient HF modes. I refer to PSK, CW and SSB in the hands of trained operators. Besides greatly inconveniencing the bulk of operators on amateur radio, symbol rate services/modes translate to wide band which will serve to essentially raise the general noise floor in the amateur assigned spectrum. What the FCC has in place as to self policing is impaired by signals that are un-identifiable without special equipment and are difficult to move when interference is occurring when automated. Please reject this proposal.

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Major CAP