

The only thing RM-11708 accomplishes is allow PACTOR 4 - a commercial protocol for internet and e-mail access that operates at 1800 baud in a 2.4 KHz bandwidth - in the bands traditionally protected from interference by wideband transmissions. PACTOR 4 has a crest factor (peak to average ratio) of less than 4 dB; that is 2 dB less than PACTOR 3 which is already a significant source of interference in the upper portions of the "CW and RTTY bands".

In addition, RM-11708 opens the door to STANAG, MS-110 and other 2400/3600 baud 2.8 KHz wide protocols. A single station using any one of these protocols (PACTOR 4, STANAG, MS-110, etc.) can wipe out the entire JT65 or JT9 "watering hole" - and most of \*both\* on a given band.

Unrestricted proliferation of these wideband, "dense" emissions in spectrum traditionally reserved for narrowband (< 300 or 500 Hz) modes will make conditions worse for all and turn the spectrum over to commercial exploitation.