To the Commission

Please dismiss RM-11708, it has failed to demonstrate the “need” for removing the symbol rate restriction, had no technical review outside ARRL, causes more problems and is an answer to a non-existant problem. There is no threat to the ham bands by a waveform that doesn't exist either in commercial or government circles, on HF, that I'm aware of and I don't foresee an amateur radio experimenter developing a waveform of that type. All current experimentation has been with very narrow modes, some measured in Hertz of bandwidth not kHz.

There is no current IARU band plan that doesn't allow protected areas for narrow bandwidth users, usually 500Hz maximum, and does permit wider digital modes to share the same spectrum with voice up to 2.7kHz. Mixing dissimilar bandwidth modes has been shown not to work in multiple comments on this RM and also this one from RM-11306, the author has served as an advisor to the ARRL in band planning and digital matters
http://apps.fcc.gov/ecfs/document/view?id=6518324273

"wider band analog or digital modes, and especially, high speed, 100 percent error free wideband data transfer protocols under local and remote control have no business in the same space with the narrow band "conversational," real-time typing speed modes, and experience is showing that combining such operations of different bandwidths just causes conflict regardless of the nature of the protocols involved. This does not mean that Amateur operators using different modes, be they digital or analog, cannot share the same band space in the Amateur spectrum, but the fact that they are of relatively equivalent bandwidth plays an important role in their ability to co-exist." (excerpt from K4CJX comment on RM-11306)

The petitioner has said that those opposed to the petition don't understand it, the majority of those in favor seem to be people wanting faster email delivery on HF and has nothing to do with rules modernization other than to allow some, old by digital standards, waveforms access to the amateur spectrum

If the primary justification is to update archaic outdated rules then perhaps the commission should update the rules for unattended station operation and the use of Pactor as a legal ham mode. Those rules were written a long time ago so must be outdated as well. The unattended stations have failed to produce adequate means and methods of interference mitigation and under current rules have expanded well out of the automatic sub bands, the interference continues today.

The primary mode of choice these stations is Pactor 2 or 3 which by it's nature is impossible to identify, cw identification has been turned off, or monitor content which defeats self-policing by amateurs. The primary users of these unattended stations appear to be boaters using them as an email service which could be accomplished by any number of global marine email providers such as YellowBrick Tracking http://www.yellowbrick-tracking.com/?page_id=1523 This practice seems to be in direct violation of Part 97.113(5) These unattended Pactor stations may be in violation of more rules such as third party agreements but the average observer has no way to know. It may be past time to revisit the Pactor and unattended station rules.

Thank you

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K0IDT