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I urge the FCC to reject RM-11708. The ARRL has not adequately explained why this rulemaking needs to eliminate the narrowband protections of all CW, RTTY and data users in the HF bands. Amateur radio has always been about experimentation, but this ploy on the part of the ARRL appears to have been cooked up by a group of non-technical people who want to have the Internet allowed on the amateur radio bands. RM-11708 will permit unlimited data rate signals with a 2.8 KHz bandwidth within all of the present CW/RTTY/data sub-bands. These sub-bands will be occupied by computer controlled automatic stations that will use them for high frequency (HF) radio Internet connections, and digital voice and/or image data. It would be to the total detriment of CW, RTTY and narrowband data users in the United States of America, and also worldwide, if the FCC made a favorable ruling on the ARRL's proposal.

The International Radio Union (IARU) specifically has urged countries in all three ITU Regions of the world to harmonize, and to avoid wideband data in the lower portions of the shared amateur radio spectrum, where CW, RTTY and narrowband data exist today. Also, the IARU urges all countries to preserve protections of 200 Hz for all CW operators, and 500 Hz for RTTY and narrowband operators. RM-11708 threatens to destroy the narrowband modes in HF while creating global interference from the not-in-the-public-domain proprietary Factor 4 protocol stations, and other automated stations that fail to listen before transmitting. The IARU recommends strong limits on automated stations, however, RM-11708 is completely silent about the problem with automated stations, that are supposed to be regulated under Part 97.221, and rewards their bad behavior (not listening before transmitting) with a request for unlimited data rates and 2.8 kHz bandwidths. The adjacent ITU Regions or sub-Regions will suffer from harmful interference caused by the 2.8KHz bandwidth and unlimited data rates. RM-11708 is a perfect example of how the ARRL is not concerned about how to protect the narrowband users of CW, RTTY, and narrowband data, worldwide. RM-11708 attempts to remove a long-standing FCC rule in Part 97.307, the 300 baud symbol rate per second speed rule, that fundamentally protects all current CW/RTTY/DATA users by ensuring that most every signal has a narrow bandwidth of not more than 500 Hz. RM-11708 attempts to take away this FCC protection from all of today's amateur radio operators. The innovations on HF data have come about from the narrowband modulation developments of JT65, JT9 and PSK31, but CW is still the most reliable and versatile mode for providing emergency communications on low power with modest antennas. Wideband data for Internet email is simply not appropriate in the HF CW/data bands where voice modes have never been allowed to operate. Internet email, if authorized, should be relegated to VHF and UHF frequencies, or co-exist in the SSB/image bands, or have its own sliver of a sub-band while ensuring that the RTTY, CW, and narrowband data signals are protected by the current 300 baud limit of in Part 97.307(f)(3).

Thank you for rejecting RM-11708