Walter B. Fair, Jr., P. E.
12230 Palmfree St., Houston, Texas 77034
wfair@comportco.com

June 21, 2014

The Federal Communications Commission
Washington, D. C. 20554

Subject: Comments concerning RM-11708

Dear Commissioners:

I respectfully submit the following comments concerning RM-11708, the proposal by the ARRL regarding allowing wideband digital modes in the HF amateur bands. I am an active amateur radio operator and enjoy all of the communication modes, including voice, digital and CW. I am also a Life Member of the ARRL and a licensed Professional Engineer in the State of Texas. As such, I urge the Commission to reject RM-11708.

The proposed rule changes solve no current problem and as such, are not needed. The ARRL, which advertises itself as representing amateur radio, has not obtained consensus from its membership, has not presented technical justifications for the proposed rule changes, have not shown how such changes benefit amateur radio in general, nor how they promote the basis for amateur radio. The ARRL indicates that experimentation with wideband experimentation is needed, but do not present technical reasons why this is not better done at higher frequencies, such as VHF and UHF. Neither do they explain how the wideband modes can improve the usage of the existing limited HF frequency bands allocated for amateur use. Indeed, it would seem that allowing wider bandwidth modes across the HF bands would effectively reduce the number of signals that can share the bands, causing more potential interference and also contribute toward commercialization of the amateur bands.

It is interesting to note that most recent technical innovations appear to use, not wider, but narrower bandwidths. The use of narrow bandwidth signals has the well-known advantages of reducing signal-to-noise ratio and allowing more signals to simultaneously share the existing frequency bands. The rules changes proposed in RM-11708 do not show how the proposed changes would improve the situation, nor does the proposal explain why going to wider bandwidths would improve the incentive to experiment or allow better utilization of the existing bands.

It appears that the main impetus for the proposed rule changes is to allow the use of existing internet and email technology on the amateur bands without paying for existing commercial services. If this is true, then it flies in the face of the amateur radio service as defined by both US and international rules. If it is not true, then the proposers should be required to explain why such use will not take place and what procedures should be implemented to ensure that amateur radio is not used to circumvent commercial services. It is also important to point out that simply migrating existing wideband technology to the limited HF bands does nothing to improve technology.

I also would like to bring to the attention of the Commission the comments previously submitted in opposition to the ARRL's previous proposals, RM-11305 and RM-11306. These comments clearly enumerate the various problems associated with bandwidth bandplanning. In countries where bandwidth bandplans are already adopted, the two most common problems existing are the general disregard for bandwidth boundaries exhibited by many Amateurs, and the inherent interference problems caused by mixing modes of dissimilar modulation schemes.

In conjunction with consideration of RM-11305 and RM-11306, information was sought as to the reasons why wideband digital enthusiasts wanted more spectrum (along with the ability of automatic stations to roam the voice bands freely). No compelling evidence could be found that this was any more than a wish or desire. On the contrary, with a usage rate of about 1%, wideband digital enthusiasts could easily accomplish data transfer as done today in far less spectrum than they actually use. I would not seek to limit digital use, but the general consensus of Amateurs (as seen in comments against RM-11305) is that they do not want Internet-like wideband data services on Amateur HF frequencies due to the bandwidth required. One wide digital signal using the bandwidth needed for competitive internet data rates would displace several normal Amateur contacts (QSOs) thereby being spectrally inefficient.

It appears on the face of things, that the current proposal is another attempt by the ARRL to impose similar rules which have already been strongly opposed by the amateur radio community and rejected by the Commission. As many commenters previously pointed out, the bandwidth regulation petitions (RM-11305 and RM-11306) were accurately described as “a solution in search of a problem” and would contribute to efforts seeking the commercial use of amateur spectrum allocations. RM-11708 appears to follow the same trend towards not solving any existing problem, but paving the way towards allowing commercial use of the amateur HF bands.

Conclusion. In conclusion, I implore the Commission to reject the rules changes requested in RM-11708, since they solve no documented problem, have potential for increasing interference on the amateur HF bands, would serve to reduce the number of simultaneous signals on the bands, and take a step toward allowing commercialization of the amateur radio service.

Respectfully,

Walter B. Fair, Jr., P. E.
12230 Palmfree St.
Houston, Texas 77034
wfair@comportco.com

W5ALT
ARRL Life Member