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I, and many of the thousands of other licensed radio amateurs are users that R<M-11708 would hurt. The amateur service and its emergency capability would also be impaired by the implementation of RM-11708. The use of this spectrum is expanding as we speak, as more and more amateurs discover the higher quality of communication that it affords.

Furthermore, RM-11708 solves no problem and will only increase interference from automated stations to narrow bandwidth human to human spectrum users. The RM suggests experimentation is needed but this appears to be a back room effort by a few non-technical people (see http://www.arrl.org/files/file/About%20ARRL/Committee%20Reports/2013/July/Doc_28.pdf) to allow Internet on amateur radio bands to the great detriment of CW, RTTY and narrowband data users.

This may lead to further violations of FCC Part 97.221, as well as possible violations of FCC Part 97.113(a)(5) depending on application.

Almost every innovation on HF data has come from the narrowband modulation developments of JT65, JT9 and PSK31, and CW is still the most reliable and versatile mode for providing emergency communications on low power with modest antennas.

The proposal does not follow the IARU recommendations throughout the world, and shows how the ARRL is not suitably equipped to protect the narrowband users of CW, RTTY, and narrowband data.

RM-11708 threatens to destroy the narrowband modes in HF while creating global interference from many Pactor 4 and other automated stations that fail to listen before transmitting.

Internet email is simply not appropriate in the HF CW/Data bands.

The FCC should maintain protection for all incumbent CW, RTTY and narrow band data mode users who would otherwise be overrun by asymmetric interference from wideband data modes, including PACTOR 3 and PACTOR 4, if RM-11708 is adopted. I urge the Commission to maintain the 300 baud limit *and* impose a 500 Hz bandwidth restriction while allowing RTTY/data to operate with up to 2.8 KHz bandwidth in the other (wideband) parts of the amateur HF bands.

Thank you for rejecting RM-11708.