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Please accept the following comments regarding RM-11708.

I have been an FCC licensed amateur radio operator for 57 years. During that time I have enjoyed many of the privileges of this great hobby. The privilege that I most greatly enjoy, is communicating with other individuals via CW. RM-11708 proposes to eliminate a significant opportunity for users of CW and other narrow band emissions to pursue our desired mode of communication. Sub-bands already exist, which accommodate wide band emissions. RM-11708 would introduce wide band emissions into spectrum that is currently utilized by many users of CW, RTTY, PSK31 and other narrow band, low baud rate emissions.

I feel that RM-11708 is an irresponsible proposal, filed without consideration of users who engage in human to human contact via low baud rate modes. Permitting high baud rate, wideband digital emissions into spectrum space that historically has been protected from such intrusion would result in interference levels that would eventually disenfranchise many licensed operators.

I strongly urge that the proposal be rejected.

David Bunte ? K9FN