

I write in opposition to proposed rulemaking RM-11708 and respectfully ask that it be rejected.

I have been licensed since 1968 and now primarily use the narrowband modes of CW, RTTY, JT65, JT9 and PSK31 on the HF bands. I utilize low power (QRP <5 watts) much of the time and never more than 100 watts, keeping to the rule that an amateur station must use the minimum power necessary.

It is clear to me that the proposed rule changes would make it quite likely that HF narrowband users would be subject to significant and increased interference.

I have no objection to removal of the existing 300-baud limitation, nor the use of 2.8 kHz wide data signals. However wideband, unlimited data rate transmissions will, without argument, 'crush' many narrowband transmissions under it. Thus, wideband data transmissions should be delegated by regulation to the existing areas of HF spectrum designated for SSB.

The ARRL purports that RM-11708 will protect the HF bands from the virtually unlimited wideband signals allowed today but fails to acknowledge that the 300-baud limit effectively does protect narrowband users because of the inherent inefficiency of a 300-baud transmission.

The ARRL seems to contend that band-planning and 'turning the VFO dial' should alleviate any of the problems feared by today's users of the narrowband spectrum.

The FCC Report & Order released in October 2006 offers excellent arguments against RM-11708. In Point 19 the Commission says 'We believe that separation of emission types by bandwidth is accepted in the amateur service as a reasonable means to minimize interference...?.'

In Section 18 of the same R&O, the Commission allows the use of analog transmissions (J2C, J3C and F1C) in the band segments in which CW, RTTY and data emissions are permitted because these are all narrow bandwidth emissions. This is in keeping with the sensible segmentation of transmission by bandwidth.

Now the ARRL wants the FCC to reject this sensible reasoning.

In addition to the above, RM-11708 is counter to existing IARU recommendations that narrowband protection for CW, RTTY and like narrowband emissions be ensured.

Acceptance of the proposed rules would enable use of Pactor 4 and similar 'dense' modes. Part of the ARRL argument is that emergency communications can be enhanced by using wide bandwidth modes. This is certainly true. The ability to transmit email, access the internet, and similar capabilities via the amateur radio service can prove to be of tremendous value during an emergency but by the same token, RTTY and other modes need to be protected as these are also valid and useful emergency communication modes.

Intermingling narrow and wide signals means that the wide signals 'win' everytime, particularly when there are automatically controlled wideband digital stations which cannot even listen before transmitting. It should be noted that the Pactor 2 and Pactor 3 300-baud modes currently in use cause significant interference to narrowband transmissions. A single 2.4 Khz wide signal can interfere with up to a dozen narrowband signals

As a life ARRL member, it is unclear to me what the League's motivation is in this rulemaking procedure. Clearly it is appropriate to remove the 300-baud limitation as well as to limit maximum bandwidth. But simply lifting the 300-baud limit will create a free-for-all where wideband transmissions are allowed throughout the HF spectrum. This will create problems where none (or few) exist today and does nothing to address existing problems such as the use of proprietary protocols and automatically controlled stations.

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In summary, RM-11708 is ill-considered. It does not address potential ramifications and is at best half a solution. The proposal should be rejected and the League should present a new proposal that addresses the concerns of the entire amateur community and not the narrow segment that would most benefit from the higher data rates.

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