

I respectfully submit my formal opposition to RM-11708. While the ARRL does great good for Amateur Radio, in the case of their submission for RM-11708, they have not addressed the desires and needs of large swaths of the Amateur Radio community and with their proposed rule, and set the art of CW communications within Amateur Radio in the HF bands on a path to extinction. The FCC has historically protected narrowband emissions with their own band designations and for good reason: that narrowband emissions simply cannot survive in a reasonable manner in the presence of the broadband interference-to-signal ratios of higher bandwidth emissions. CW is a vital international means of communications and is essential during times of true distress – including large-scale catastrophic events and during periods of extremely noisy atmospheric conditions – such as those which may be present during “Carrington” –like solar events in which all other means of communication may be unusable. Letting the state-of-the-art degrade and even disappear in the interest of higher bandwidth emissions makes no sense. Other alternatives exist for higher bandwidth emissions.

Furthermore, the continued use confusing and misleading terminology such as “baud rate” for such a wide variety of digital communications including morse code should be stopped. What is truly important is the bandwidth of the signal. Period. I urge you to please reject RM-11708 and legally protect the narrowband portions of our amateur bands. Please do not even allow for the possibility of “voluntary” band plans – the international continuation of the art of Morse Code and, I would argue, the continued availability of HF as a means of emergency communications during the most difficult times, depends on it. Please bolster the protections of the narrowband modes such as CW, RTTY, PSK31, etc.

For the sake of the human element of amateur radio, and to enable emergency communications and low cost access to amateur radio, please enforce the 300 baud limit and institute a 500 Hz bandwidth regulation for all CW/Data subbands. Please act by acknowledging that SSB-wide data signals in the CW/Data subbands is not appropriate, and will cause undo interference that cannot be overcome.

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