

Dear Federal Communications Commission:

As a licensed amateur radio operator, OE1VMC, I write in opposition to rule making RM-11708 and herewith ask that it be rejected and to keep the 300 baud protection for all CW and data signals in the HF CW/Data subbands.

The International Amateur Radio Union (IARU) explicitly requested that countries in all three International Telecommunications Union (ITU) Regions harmonize and avoid wideband data in the lower portions of the amateur radio spectrum. The petition submitted by the ARRL in RM-11708 ignores the desires and wishes of the worldwide amateur radio community body, the IARU.

Furthermore, I urge you to please bolster the protections of these vital narrowband modes, such as CW, RTTY, PSK31, etc. the way Japan does, and the way the IARU is urging nations to do, where wideband data signals are specifically prohibited from causing interference. To preserve human-to-human communications and to ensure emergency capabilities exist with low power, additional protections beyond the existing 300 baud limit, such as a 500 Hz bandwidth limit, is needed. The 2.8 kHz bandwidth limit being proposed by the ARRL in RM-11708 is much too wide - it is as wide as a SSB signal, and such signals have always been prohibited in the CW/Data subbands. To make matters worse, RM-11708 would allow very dense interference, much more dense in terms of power spectral density than SSB signals due to serial tone modems, that would override and interfere with dozens of current amateur operators by just a single wideband data operator.

While I believe there is a need for continued experimentation with wideband digital services it should not come at the expense of traditional modes that are used by the overwhelming percentage of licensed amateur radio operators. These wideband modes should be confined to segments of the bands in such a way as to mitigate interference and improve spectral efficiency.

Further, in 2006 your body wrote in part, "Separation of emission types by bandwidth minimizes or reduces interference because it protects narrow signals from interference from wide signals."

I respectfully request that the Commission dismiss RM-11708.

Christoph Mecklenbraeuer, OE1VMC.