

Dear Federal Communications Commission,

As a licensed amateur radio operator, AC0XJ, I am filing this comment to oppose rule RM-11708 and ask that this rule be rejected. We need to keep the 300 baud for all CW (Morse code) and data signals in the HF CW/Data sub-bands.

The petition submitted by the ARRL in RM-11708 ignores the desires and wishes of the worldwide amateur radio community body, the IARU, which requests that countries in all ITU regions work together to avoid wideband data in the lower portions of the amateur radio spectrum. I urge you to protect the narrowband modes (CW, RTTY, PSK31...) where wideband data signals are not allowed to interfere.

Countries like Japan have done this, and as we know, these bands were vital in emergencies such as the tsunami in Sendai/Tohoku. To continue ensuring that emergencies can be handled with low power, additional bands, such as the 500Hz limit, are needed. The 2.8 kHz bandwidth limit being proposed by the ARRL in RM-11708 is the width of a SSB signal, and such signals have always been prohibited in the CW/Data sub-bands. 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 only a single wideband data operator.

Wideband digital services are important, but should not eliminate modes used by a huge percentage of licensed amateur radio operators. I teach hundreds of students in electrical engineering every year, and many of them continue to develop communications infrastructure. These students have been building as a part of our curriculum radios in the lower CW bands and would also be affected, during their studies as well as after they join the workforce.

I respectfully request that the Commission dismiss RM-11708.

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