

Re: RM-11305, Petition for Spectrum Deregulation in the Amateur Service

Date: January 14, 2006

Petitioners begin by stating a desire to remove all regulated emissions/bandwidth allocations and open the medium- and high-frequency spectrum to voluntary coordination. They claim current allocations do not reflect usage levels and that Amateur interests would best be served by allowing use of any mode on any frequency. They would rely on "good judgment" to prevent mutual interference.

While it is difficult to disagree with the stated philosophy, exercising good judgment requires good information. The Amateur bands were segregated by mode because the people who determined subband limits had good information. They understood the need for regulated segregation. They exercised good judgment, and the Commission should not overturn those decisions by mandating across-the-board deregulation.

Petitioners also claim current regulation acts to inhibit technical development and discourages many Amateur Radio operators from using the MF/HF spectrum. But the petition contains no evidence to support either contention. In fact, RM-11305, if adopted, would likely discourage more Amateur Radio operators than it encouraged.

The radio spectrum has been divided by mode and class for several decades. No one would suggest that commercial-FM-broadcast stations share bandwidth with commercial television stations, because the modes are incompatible. Broadcast and land-mobile-service stations are assigned frequencies and operating modes for good reason. Such allocations do not increase the Commission workload; if anything, they reduce it. Similar separation-by-mode theory applies to the Amateur bands as well. That narrowband and wideband modes operate on contiguous band segments is logical but incidental. In point of fact, the 75-meter phone band and the 80-meter CW and RTTY bands are three separate entities. They should remain separated by regulation. Voluntary coordination within those subbands is desirable, and is in place. There is no need for the Commission to incorporate any of the suggestions in RM-11305 into Part 97 of its Rules and Regulations.

Respectfully submitted this date.

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