

I support the petition in RM-11392 for several reasons, but recommend carrying it further to limiting Pactor communications in the data segments of the amateur radio service to Pactor 2. There are now years of evidence that automated data stations using Pactor, particularly for the WinLink service, are inconsistent with the concept of shared frequency space in amateur radio.

The most significant problem is that the operation of automated data stations permitted by 97.221(c) on frequencies other than those authorized in 97.221(b) has not worked well in shared frequency space. Despite their 500 Hz maximum bandwidth, these stations became a major source of QRM to other modes because they don't use busy detection for these other modes and because users of the services they provide apparently either can't hear other modes operating on the frequency the automated station can, or they interrogate them despite other traffic. As a minimum, 97.221(c) needs to be deleted and all automated data stations, regardless of bandwidth, mode, or interrogation, should be restricted to the frequencies authorized by 97.221(b). If nothing else in this petition is adopted, this should be.

In addition to the well-stated justifications presented in the petition, here are some other points.

There are twenty-four United States call signs listed as WinLink PMBOs on the organization's web site, many of whom operate on multiple ham bands. With the exception of 40 meters, there is sufficient frequency space in each of the non-WARC bands for at least thirty 500 Hz Pactor 2 PMBOs to operate simultaneously without the potential of interfering with one another. At full bandwidth, Pactor 3 only allows for a handful, and would require the 97.221(b) segments to be expanded four to five times to support as many simultaneous, potentially non-interfering stations as Pactor 2. Even at the 1,500 Hz allowed by this petition, that number is only about ten and would require three times the frequency space.

Despite writings to the contrary on the WinLink website, the reality is that the 97.221(b) frequency space is considered and

treated as "theirs" by WinLink developers and users. They have stated this in writing on Internet forums. In effect, expansion of 97.221(b) segments would leave less for other modes and should be out of the question. However, since even these segments are supposed to be shared with other modes, the use of busy detection that recognizes other modes should be mandatory in the 97.221(b) segments.

With Pactor 3, WinLink attempts to provide the same level of throughput as SailMail and other commercial providers. This is a transmission prohibited by 97.113(5) "Communications, on a regular basis, which could reasonably be furnished alternatively through other radio services." Restricting automated amateur data transmissions to less than full speed Pactor 3, especially to Pactor 2, not only resolves this competition issue by increasing the apparent value-added to the commercial services, but it also accommodates more WinLink operators within the given frequency segments.

Neither this petition, nor restriction to Pactor 2, should be the end of any service as so many of the cut-and-paste comments allege.

Finally, as a military communications officer, I find both the use of email and dependence on the commodity Internet for emergency communications foolhardy at best. It should only be a choice of absolute last resort, and not relied up as standard operating procedure. Advocation of WinLink for EMCOMM makes the word "amateur" in amateur radio more relevant to its synonym, "unprofessional." That hasn't been the case over many decades of emergency communications provided at a professional level by the amateur radio service.

This petition is a boil bursting to the surface of amateur radio. It's the result of infection allowed to grow to the polarizing point the service is becoming one of hate and intolerance for fellow members. Even as an advocate of minimal government interference and regulation, I believe action by the FCC to address this problem is overdue.

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