## It Seems to Us

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# Revisiting FCC 80/75 Meter "Rezoning" 

4- It was a surprise when in 2006 the FCC decided to 'rezone' $3600-3750 \mathrm{kHz}$ from RTTY/data/CW to phone/image/CW. ARRL members have endorsed a modest adjustment to address what experience has shown to be negative consequences. 77

In April 2004, the FCC issued a Notice of Proposed Rulemaking (NPRM) soliciting comments on an ARRL proposal for, among other things, a $25-\mathrm{kHz}$ extension of the 75 meter phone/image band with an equivalent reduction in the 80 meter RTTY/data band (CW, as always, being permitted throughout both bands). The FCC did not act on the proposal until October 2006, and when it did the decision was startling: instead of a modest realignment and despite there being few comments suggesting such a radical change, the 80 meter band was shrunk by $60 \%$ instead of by the $10 \%$ that had been proposed. In a matter of a few weeks, CW net and other activity that previously had been spread across 250 kHz had to be compressed into 100 kHz at a time when RTTY and data activity was increasing rapidly.

For the CW, RTTY, and data operators who were negatively affected it was a painful adjustment. On the other hand, it must be said that phone operators - particularly those with Extra Class licenses - enjoy the additional elbow room. Domestically, Extras now have exclusive use of $3600-3700 \mathrm{kHz}$ and share $3700-3800 \mathrm{kHz}$ only with a diminishing number of Advanced licensees who are now less than 7\% of the US amateur population.
In January 2014, the ARRL Board of Directors asked its HF Band Planning Committee to solicit input as to how the users of the various data, RTTY, and CW modes could better coexist in the RTTY/data subbands. This initiative was not limited to 80 meters, but members' comments referred repeatedly to problems that had resulted from the FCC's action.

After study, the committee advised the Board that the situation on 80 meters could be improved only if there was a restoration of some of what had been lost in 2006. The committee recommended a shift in the boundary between 80 and 75 meters from 3600 kHz to 3650 kHz and included that in the strawman proposals for changes in the ARRL band plans that were presented on pages $69-71$ of the April 2015 issue of QST and on the ARRL website. A survey form was posted on the website along with a solicitation for comments.

All of the strawman proposals were endorsed by majorities of the more than 1000 respondents. In the case of the 80/75 meter realignment, $59 \%$ supported the proposed shift of $50 \mathrm{kHz} ; 4 \%$ supported a shift of more than $50 \mathrm{kHz} ; 4 \%$ supported a shift, but by less than 50 kHz , and $29 \%$ favored the status quo ( $4 \%$ offered no opinion). In other words, $67 \%$ supported some realignment. Moving the automatically controlled digital station (ACDS) segment from $3585-3600 \mathrm{kHz}$ to $3600-3615 \mathrm{kHz}$ was also strongly supported. Accordingly, at its July 17-18 meeting, the Board authorized the filing of a Petition for Rule Making with the FCC to accomplish these adjustments. Even reduced by 50 kHz , the 75 meter band will remain by far the widest HF phone/image allocation below 28 MHz .

At the request of the Board, the online survey also floated two questions with regard to data emission privileges for Technicians and Novices in the portions of the 80 and 15 meter bands where they are authorized to use CW. Petitioning the FCC to grant these privileges was supported by $53 \%$ to $42 \%$ in the case of 15 meters and by $52 \%$ to $45 \%$ in the case of 80 meters. While these margins of endorsement are somewhat narrower than with regard to the bandplan changes and the 80/75 meter realignment issues, after discussing the pros and cons the Board decided to include them in the Petition for Rule Making, with the additional mode privileges on 80 meters to be contingent upon expansion of the band.

Recapping the FCC Part 97 rules changes to be sought:

1. A shift in the boundary between the 80 meter RTTY/data band and the 75 meter phone/image band from 3600 kHz to 3650 kHz ;
2. Frequency privileges in the $3600-3650 \mathrm{kHz}$ segment to be returned to Advanced and General licensees and extended to Technician and Novice licensees;
3. A shift in the ACDS subband from $3585-3600 \mathrm{kHz}$ to 3600 -3615 kHz;
4. RTTY/data privileges for Technicians and Novices in the portion of the 15 meter band where they are now authorized to operate CW, ie $21.025-21.200 \mathrm{MHz}$;
5. Contingent upon the expansion of the 80 meter band being sought, RTTY/data privileges for Technicians and Novices in the portion of the band where they are authorized to operate CW, ie $3525-3650 \mathrm{kHz}$.
With regard to the last two points, these frequency ranges extend beyond the subbands for RTTY and data that are designated in the voluntary ARRL and IARU band plans. The situation would be analogous to the present 10 meter band, where Technicians and Novices are permitted by rule to use RTTY and data (as well as CW) between 28.0 and 28.3 MHz but are expected, as is everyone else, to adhere to the band plan to the greatest possible extent.
As always, it will take some time for the petition to be drafted and it will not be filed until the ARRL Executive Committee has given its approval. Thanks go to the members and others who have offered their input in two rounds over the past 18 months.
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