

DS LAW, PLLC

1629 K Street NW Suite 300
Washington, DC 20006

David R. Siddall
(202) 559-4690

March 27, 2020

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Notice of *Ex Parte* Presentation: WT Docket 16-239, RM-11759, RM-11828, RM-11767

Dear Ms. Dortch:

On March 25, 2019, Rick Roderick, President of ARRL, the national association for Amateur Radio (ARRL); Dan Henderson, Regulatory Affairs Manager, ARRL; and I participated in a teleconference with the following members of the Wireless Telecommunications Bureau staff: Dana Shaffer, Kari Hicks, Tom Derenge, Paul Moon, & Rodney Conway. Dr. Monisha Ghosh, the Commission's Chief Technology Officer, also participated.

The slides used in discussing issues of concern in the above-listed proceedings are attached. The points discussed are the same as those made earlier by the ARRL in filings submitted in the above-referenced proceedings.

Pursuant to Section 1.1206 of the Commission's Rules, this letter is being electronically filed in the above-referenced dockets and a copy e-mailed to each participant. Please refer any questions to David Siddall at the above address.

Respectfully submitted,

ARRL, The National Association
For Amateur Radio
225 Main Street
Newington, CT 06111

ARRL, THE NATIONAL ASSOCIATION
FOR AMATEUR RADIO

By:

A handwritten signature in blue ink that reads "DR Siddall". The initials "DR" are written in a stylized, cursive font, followed by the name "Siddall" in a similar cursive script.

David R. Siddall
ARRL Washington Counsel

cc: Dana Shaffer
Kari Hicks
Tom Derenge
Paul Moon
RodneyConway
Monisha Ghosh

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Amateur Radio Proceedings

- **RM-11767 -- HF Amplifier Petition**

Expert Linears America, LLC (SPE) petitioned for eliminating a rule, Section 97.317(a)(2), that limits HF amplifier gain to 15 dB. This petition continues to be pending. ARRL supports eliminating this restriction. Modern solid-state components in amplifiers allow much greater gain than the earlier tube amplifiers. The original reason for adopting this restriction – to prevent operation on the 27 MHz CB band – no longer exists. Modern amplifiers are easily restricted by other means, and this requirement imposes undue costs on amateurs using low-power transceivers who wish to upgrade to full power. There is no comparable limit in other countries and amplifiers with much more gain are in common use elsewhere. Amplifiers for the U.S. market must be throttled back with special components, making them less efficient and imposing unnecessary costs on both the Amateur and the manufacturers.