

Before the

In the Matter of

## RESPONSE EFFORTS UNDERTAKING

Comments on behalf of the AMATEUR RADIO SAFETY FOUNDATION, INC.

## 1. Background

The Amateur Radio Safety Foundation, Inc (ARSFI), is a 501(c)(3) non-profit, public benefit corporation registered in the State of Florida. It is not organized for the private gain of any person. It is organized under the Non Profit Public Benefit Corporation Law for public and charitable purposes.

The purpose for which the corporation is organized is to transact any lawful business for which Non Profit corporations may be organized under the laws of the State of Florida, as they may be amended from time to time and under Section 501 (c) 3, Internal Revenue Code. The primary, but not limiting, purpose of the corporation is to provide for the formation, training, maintenance, and testing of volunteer licensed amateur radio emergency services and networks using state of the art communications technology. These services and networks to serve the general public by facilitating emergency, health, or welfare communication in times of disaster or other communications emergency.

The primary project of ARSFI is the Winlink Global Radio Email (SM) system/service.

The Board of Directors of ARSFI is comprised of prominent licensed radio amateurs who are also members of the technical Winlink Team. I, Loring Kutchins, was elected as President of ARSFI in September, 2017, and serve as the Chairman of the Board under the Bylaws of the corporation. I represent the entire Board of Directors with my comments.

I, Loring Kutchins (W3QA) and other members of the Winlink Team, Mike Burton (N6QZB), Tom Whiteside (N5TW), were in direct contact via radio email with the ARRL/ Red Cross deployed amateur operators and their control stations during their deployment to Puerto Rico in 2017. We provided training, operating suggestions, priority

assistance and we optimized US and Mexico-based radio stations to receive and route their messages.

Similarly, we provided direct assistance to operators representing other organizations and agencies using Winlink, including DHS NCC SHARES, Southern Baptist Disaster Relief, and Salvation Army.

## 2. Comments

With respect to the input requested by the Federal Communications Commission regarding communications during the 2017 Hurricane Season and questions asked of amateur radio operators, the Board of Directors of ARSFI fully endorses the comments submitted by Steve Waterman, former President of ARSFI (ID 10123298305905). We fully agree that amateur radio operators under today's Part 97 restrictions are unable to fully provide services in connection with the planning, testing and provision of emergency response and disaster recovery communications. Yet there is a role for radio amateurs, particularly when it is the only communications means available (as demonstrated so surely in Puerto Rico).

The restrictions Steve discusses are also impediments to other purposes of the amateur service.

### **§97.1 Basis and purpose.**

The rules and regulations in this part are designed to provide an amateur radio service having a fundamental purpose as expressed in the following principles:

- (a) Recognition and enhancement of the value of the amateur service to the public as a voluntary noncommercial communication service, particularly with respect to providing emergency communications.
- (b) Continuation and extension of the amateur's proven ability to contribute to the advancement of the radio art.
- (c) Encouragement and improvement of the amateur service through rules which provide for advancing skills in both the communication and technical phases of the art.
- (d) Expansion of the existing reservoir within the amateur radio service of trained operators, technicians, and electronics experts.
- (e) Continuation and extension of the amateur's unique ability to enhance international goodwill.

In fact, the restrictions also impede today's amateur from fulfilling the purpose of the service in principles (a) through (d) of rule 97.1, especially with respect to participation in emergency or disaster relief deployments, being prepared, equipped, or even desirous of doing so. Because amateur radio already has 1) the best reservoir of trained operators and technicians needed in relief operations, 2) a pool of available equipment owned by the individual operators, and 3) the purpose (under the rules) to participate when called, and 4) because this resource is clearly the last resort in extreme disasters like Puerto Rico, going forward *the FCC should clearly make efforts to increase the use of amateur radio services for emergency and recovery communications.*

However, removing the archaic symbol rate restriction, regulating spectrum by bandwidth and not content, and addressing the other restrictions on the amateur operator will be needed before increasing the use of amateur radio services becomes practical and effective.

Thank your for this opportunity.