

Reply to ARRL comment on ET Docket No. 17-344

On the submission by ARRL in response to the Commission request for input on the future role of amateur radio in disaster relief efforts. I'm a bit concerned that ARRL chose this venue to lobby for rules changes, may have oversold amateur radio capabilities and did not respond to the questions posed. My apologies to the Commission for the distraction from the purpose of the original request.

A few problem areas in the ARRL filing:

Page 4, Paragraph 5

“Amateur Radio operators provide communications for the benefit of first responders until public safety facilities are restored to operation. They conduct temporary dispatch operations and substitute 911 services, cellular and conventional and trunked land mobile systems.”

Amateurs can indeed provide some backup services but “substitute for cellular or trunked LMR system” may be over optimistic.

Page 5 Paragraph 6 (continued from page 4)

“Amateur broadband systems and other high-data-rate multimedia systems are in full deployment now.”

Where are these systems and what constitutes “full deployment”? Local, Regional, Nationwide? What are the capabilities of these systems?

Page 5 Paragraph 7

“Since the Amateur Service is not dependent on fixed infrastructure and is ubiquitous, the ability of radio Amateurs to provide reliable communications instantly over any path cannot be defeated by any disaster, act of terrorism, or by any other means whatsoever.”

We are currently experiencing a sunspot minimum and MF/HF communications are not reliable at this point in time perhaps the words “instant” and “any path” were a poor choice.

Page 23, Paragraph 32

“There are relatively few regulatory needs that the Amateur Service has in order to even better fulfill its 47 C.F.R. §97.1(a) **obligation** to provide emergency and disaster relief communications. There are, however, three very noteworthy and urgent needs that do call for some regulatory involvement of the Commission, right now. The first relates to an outdated regulation that limits data rates in HF Amateur communications, precluding certain digital emissions that have recently proven extremely important in Amateur Radio hurricane relief efforts.”

I may be wrong but 47 C.F.R. §97.1(a) says nothing about an “obligation” or requirement to perform any communications function, only recognizing the “value” of amateurs as a voluntary noncommercial

communication service. What “certain digital emissions” were precluded from use? Pactor 4 which seems to be the focus of this whole exercise? Urgent need for regulatory involvement? See the next area of concern.

Page 24, Paragraph 34

“Equipment dispatched with the “Force of 50” to Puerto Rico included data transmission equipment capable of PACTOR 4 operation, but it could not be legally used in the Hurricane Maria disaster relief effort. ARRL filed a request for a temporary waiver to permit amateur data transmissions at a higher symbol rate than currently is permitted by Section 97.307(f) of the Commission’s rules, in order to facilitate hurricane relief communications between the continental United States and Puerto Rico.”

According to reports, from people on the ground in Puerto Rico’s “Force of 50”, which turned out to be only 22 operators, the equipment initially sent was not capable of Pactor 4 operation. Pactor 4 modems were available but never deployed even after the FCC granted an STA. This puts into question the “urgent need” for a rules change. The number and types of messages actually sent, if any, with Pactor 4 on amateur frequencies is not stated.

It took 21 pages to get to the real reason for the comment, a push for RM-11708, WT 16-239 and HR555, The Amateur Radio **Parity Act** of 2017. These are described as “needs” but the on file public comments are opposed to the first 2 and HR555 is legislation, not a Commission rule. The reason for lobbying for RM-11708 and WT 16-239 is not clear if there was a “need” for Pactor 4 and no Pactor 4, even though available, was used by the “Force of 50” in an event of this magnitude. Why HR555 was even brought into the comment is questionable as others have pointed out.

Amateur radio did indeed have some “value” in this instance and has worked in the past, as shown in the historical references in the filing, for disaster assistance without the “need” for high speed data. I would have much preferred ARRL focus on ways to incorporate amateur radio into current scenarios rather than past accomplishments and a lobbying effort. Amateur radio can play a role in disaster recovery but that role needs to be better defined with respect to today’s communication world. For these reasons I would urge the Commission to reject RM-11708 and WT 16-239 as not needed.

Respectfully submitted,

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