Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of )

)

Amendment of Part 97 of the ) RM-11831

Commission's Amateur Radio Service )

Rules to Reduce Interference and )

Add Transparency to Digital Data Communications )

To: The Chief, Wireless Telecommunications Bureau

Via: Office of the Secretary

INTRODUCTION

Comments by John Hays, Amateur Extra Class Licensee, station license K7VE

COMMENTS

1. Automatically Controlled Data Stations (ACDS) have been in operation in various forms since at least the early 1980s. On HF they are limited to very small segments of the bands, on VHF and above they have more frequencies and modes available. Today, these range from relatively low data rate systems for email (e.g. Winlink, used in Emergency Communications) to full data systems running multi-megabyte TCP/IP circuits in the microwave spectrum (see HamWAN).

The proposed general elimination of Automatically Controlled Data Stations would hinder disaster and public service communications. It would also stifle the experimental and extension of the art aspects of Amateur Radio.  
  
I request the Commission reject RM-11831 with respect to ACDS.

2. The proposal further seeks to restrict the use of digital modes to only those which can be decoded by free “open source” software.  
  
The rules only require that transmissions not seek to obscure the meaning of the communications. This allows further development of new techniques, modes, protocols, and methods of transmission, advancing the art and capabilities of the Amateur Radio Service.  
  
The FCC has permitted patented and proprietary technology in the Amateur Service, such as SSB, FM, TDMA, etc. The inability of a given individual from obtaining the requisite equipment or technology is not a justification from allowing others to do so, so long as the methods and techniques are known and said equipment and technology can be readily obtained, whether via free software or commercial license.

I request the Commission reject RM-11831 with respect to assertations of lack of  “Open monitoring” with the understanding that the rules already address encryption and malicious interference.

Respectfully submitted,

/S/  
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Date: April 1, 2019