

As a licensed amateur radio operator, I wish to register my objection to RM-11831 as it is currently written. While it was originally intended to reduce interference issues and to ensure that transmissions can be monitored, the proposed changes will not be more effective than the status quo and could in fact make issues worse.

First, amateur radio transmissions are already required by law to be able to be monitored by third parties (§97.309(a)(4)). Already available software that can display a waterfall (for instance, fldigi) combined with information such as what is located at [https://www.sigidwiki.com/wiki/PACTOR\\_III](https://www.sigidwiki.com/wiki/PACTOR_III) allows an operator to determine that a specific mode is being used. From there, hardware and software can be procured or developed to decode the transmission.

Second, per §97.309(b), transmissions of "unspecified codes" are already allowed as long as a) the US has an agreement with the destination country to allow such codes and b) requirements are met to ensure that the meaning of the transmission cannot be obscured. Per those requirements, logging of transmissions by e.g. Winlink is sufficient as they can be mapped directly to the original transmission. Additionally, the proposed changes to §97.309(a)(4) will conflict with (b) as written due to said changes effectively mandating specifications for all digital transmissions originating from the US.

Finally, removal of §97.221(c) will not resolve any interference issues involving automated stations. Stations originating outside the US are not subject to US laws, for instance, meaning that they could potentially transmit signals outside the automated subbands that US amateurs can receive. Additionally, restricting lower bandwidth automated stations to the subbands will increase crowding on those bands, increasing the potential of interference among those stations and the amateurs using them.

Thank you for your consideration of this and other comments regarding this matter.