

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the matter of)	
)	
Amendment of Part 97 of the Commission's)	
Rules Governing the Amateur Radio Service)	RM-11831
Rules to Reduce Interference and)	
Add Transparency to)	
Digital Communications)	

To: The Chief, Wireless Telecommunications Bureau
Via: ECFS electronic Filing

April 13, 2019

COMMENTS OF JEFFREY SAMUELS, N0WTF

I hereby oppose this Notice of Proposed Rulemaking, as it is inconsistent with the spirit of Part 97 of the Commission's rules, which have long held that experimentation and advancement of the amateur hobby are key components of the Commission's approach to regulating Part 97 operations.

No doubt, these arguments being made by the submitter are the same old recycled complaints that we have been hearing for decades, including but not limited to CTCSS, and then CDCSS, as well as numerous audible identifying protocols such as MDC-600 and MDC-1200. It is the same thing on a different day and completely disregards the advancement of the hobby these example protocols have led to over the last 40+ years.

Additionally, the submitter appears to have a misconception about his or her entitlement to accessing the numerous modes authorized by Part 97. No doubt, the airwaves are owned by the taxpayers, however the equipment used on those airwaves are not, and the submitter absolutely does not have a right to use equipment that does not belong to them.

Furthermore, the proposal appears to be subverting the Commission's rules in a way that would discourage development of new technologies for Part 97 use. What manufacturer would invest in developing new intellectual property if they knew they had to hand it over, for free, to some amateur appliance operator based on some perceived entitlement that does not exist in the rules nor precedent?

To be clear, it is my opinion that this proposal runs contrary to both the letter and spirit of Part 97, and would in fact discourage the development and deployment of new technologies.

For these reasons, I believe submitter should be thanked for their time and effort, their proposal to change the rules must be dismissed as contrary to the spirit of Part 97.