

Comments regarding Proposed Rulemaking RM-11831

Ladies and gentlemen, thank you for the opportunity to comment on Proposed Rulemaking RM-11831. I oppose the proposed rule changes presented in RM-11831.

The proposed rule would force amateur radio operators to abandon decades of development of important advances in communications technology. At a time when commercial communications are on the brink of deploying technologies like 5-G, this rule would force amateurs wishing to use digital modes to go back in time to slow and error-prone modes like RTTY and CW.

I became a licensed amateur with the sole intent of supporting emergency communications in my community. In the past 25 years, America's population has grown by 25%. A growing population means there are more people in harm's way when disasters strike. And populations are growing fastest in the areas at greatest risk from natural disasters.

Where I live, in Pierce County, WA, we are susceptible to numerous hazards, natural and man-made. We are home to the most dangerous volcano in the U.S., Mt. Rainier. We host the largest military base west of Colorado, Joint Base Lewis-McChord. Perhaps you read the about "The Really Big One" in The New Yorker, July 20, 2015 describing the consequences of a 9.0+ magnitude subduction-zone earthquake that will occur along the West Coast in the coming years. And we are growing at a faster rate than the rest of the country. With a population nearing 900,000, providing emergency communications after a massive earthquake or other disaster will require us to use every tool available.

Not allowing us to make use of digital modes will cripple our ability to assist first responders, emergency managers and disaster relief organizations. The sheer number of people that will need assistance will mean that vast amounts of data will be required for adequate response. Moving that amount of data by voice, CW or RTTY is simply not feasible. And when it comes time to move information about the sick and injured in neighborhoods or emergency shelters, privacy becomes an imperative. Having communication modes that are difficult to eavesdrop on will be important. We need to be creating new and better tools, not stripping ourselves of the capabilities we have.

Is it possible that someone could use services such as WinLink to conduct commerce? Sure. There are rule-breakers in every domain of life. In my "day job" I work with businesses to help them understand their markets and to find solutions to pressing problems and new opportunities. I often hear pleas for gigabit speeds, increased bandwidth and faster throughput. I've never heard anyone ask to revert back to 9600-baud dial-up service, which is what digital radio can provide. Any business relying on amateur radio for communications should not be a concern. They won't be in business very long.

The suggestion that any software used in amateur radio should be free and open-source ignores the reality of the hobby. Intercepting or eavesdropping on a radio signal, by definition, requires radio equipment. I don't know of any equipment manufacturer that is giving away radios. How is software any different? Why should the creators of software work for free? Why should they be forced to give

away their intellectual property? Isn't that very question at the center of our current trade dispute with China?

Forcing software developers to give away their intellectual property will halt research and development that is used by amateurs, but also gets incorporated into government and commercial systems and procedures as well. Radio amateurs have always been and always will be at the forefront of telecommunications development. Software development is an increasingly important focus of that development and should be encouraged, not regulated out of existence.

The rules proposed would be onerous and would not serve the national interest. Petitioners describe the proposed rule change as minor. Perhaps it is minor if one only counts the number of words involved. In effect, the change would be gargantuan and catastrophic. Imagine if we changed three words in the First Amendment to the Constitution -- "Congress may make laws respecting an establishment of religion, or prohibiting the free exercise thereof..." By word count it would be a minor change, but in effect it would lead to a very different American experience. Words matter and seemingly simple changes can have profound consequences. Please do not adopt the ill-advised proposal embodied in RM-11831.

Thank you for taking my comments into consideration as you review the merits of Proposed Rulemaking RM-11831.