I am and Amateur Radio Operator and sail our sailboat in remote locations where the only way to get descent weather forecasts is via digital communications via the Winlink HF radio stations.

RM-11831 will do two things that will greatly restrict availability of Winlink access:

1. Removing paragraph (c) of 97.221 reduces the available sub bands for Winlink stations to operate in.
2. Modifying 97.309(4) to require technical characteristics to have been documented publically so that it can be monitored by third parties would require a manufacturer to publish their proprietary signal processing methods eliminates Pactor 2 , 3 and 4 unless SCS releases the information. The result will be using an extremely slow method to communicate requiring significantly longer connection times to send the data.

I encourage you to not go forward with these two modifications.