I am the lead emergency communications professional for my state’s National Guard, a 13,000 member force that is active in emergency response throughout the Southeastern United States. Additionally, I am a Certified Emergency Management Professional and a DHS trained Communications Leader (COML) and Communications Technician (COMT). Based on my experience in these roles, I strongly recommend that RM-11831 be dismissed as it would be detrimental to emergency communications in this country.

In emergencies, the public safety community leans heavily on a cadre of trained, experienced, and equipped amateur radio operators that can facilitate communications when traditional means fail. This includes everything from a local county Sheriff to a state Emergency Operations Center to a Non-Governmental Organization. Given the flood of information in a disaster, communications must be fast, efficient, and accurate. RM-11831 would forever ensure that US radio amateurs are no longer fast, efficient, or accurate.

In our state, we rely heavily on licensed amateurs to backstop professional communicators and Winlink is the most valuable tool in their arsenal. During the last several major hurricanes the FCC has opened up Pactor 4 temporarily to US amateurs because it was recognized that faster data throughputs on the HF bands was vital. We should be having the discussion now of dropping the symbol rate limitations all together in order to encourage amateur radio operators to acquire the fastest technologies available and put them in play when disaster strikes. Instead, we are talking now about reducing effective throughputs and corralling operators in the US to a smaller pool of frequencies. This will dramatically increase congestion in those frequencies while leaving other needed parts of the spectrum underutilized. This will hinder greatly the ability of amateur radio operators to offer effective support in disasters.

I was always taught that the FCC allows amateur radio operators to have access to valuable spectrum in order to encourage them to advance the science of radio and to build a pool of qualified radio operators and technicians for this nation. I believe this proposal undermines both.

Dallas Clements