

I am opposed to Petition for Rulemaking, RM-11831 on several points:

- The proposed limitations on modulation methods deprives amateurs the ability to use widely accepted and proven digital technologies that are widely available at reasonable costs and more often than not for free.
- The proposed changes on automated stations would deprive amateurs and in particular the emergency communications (EMCOMM) teams/individuals of vital message and data transfer resources (particularly Winlink) for the support of served agencies and their communities. [1]
- The petition suggests that automated stations do not have human involvement. This is not true. These stations are set up to respond to message traffic initiated by another station under the control of an amateur operator. These "automated stations" also already used busy channel lock-out features to prevent interference.[2] They will not eliminate all interference, but it should be at least as effective as a human operator.
- The proposed changes do not encourage the use of more modern and spectrum conserving technologies, nor technologies that allow for more reliable data transmission, an important capability for amateurs in public service roles.
- The expectation that everything needed to receive every signal should be available for free is unrealistic and flies in the face of the protection our government has chosen to give inventors and authors through patents and copyright, but it is fair to ask that those technologies be available on fair licensing terms in the amateur service. I am not aware of any product that does not meet that expectation today (e.g. Pactor modems).
- Finally, the argument there is a national security risk that this would address is patently unsupported. Any rogue individual who is intent on illegal activity will not be dissuaded by these rules. Existing FCC rules already cover the use of encryption for obfuscation.

My background for commenting: I am an Extra class amateur (KD7DK) who has been licensed since the age of 15 (1973). I am a trained electrical and computer engineer employed for my entire career in IT infrastructure and networking. I have been heavily involved in EMCOMM for the past 5 years as a member of the Seattle Auxiliary Communications Service (part of the Seattle Office of Emergency Management). I have participated in a wide variety of EMCOMM exercise and large scale public service events.

Digital communications is playing an increasingly critical role in our support of served agencies and the public. This includes the use of digital modes on our HF spectrum below 50 MHz. We use this in challenging mountainous regions that are not served by VHF and Cellular coverage, and we plan to rely on HF digital communication in the event of a large scale seismic event in the Pacific Northwest. We drill this regularly along with our state EOC and FEMA Region 10 communication teams.

Please deny this petition. It is not in the best interests of amateur radio or our nation.

Sincerely,
Douglas P. Kingston, KD7DK

[1] We also support the comments of the Amateur Radio Safety Foundation: [ARSFI Motion to Dismiss RM-11831 and Petition for Rulemaking](#) and their comments on its impact on the Winlink network for amateur Email traffic over radio. This is extensively used in the EMCOMM community and was a critical resource during recent disasters such as the hurricane in Puerto Rico.

[2] Example, the Winlink Winmore and ARDOP radio modem implementations for HF message transmission.