I would like to express my opposition to the Petition for Rulemaking, RM-11831 as well as support the MOTION TO DISMISS RM-11831 AND PETITION FOR RULEMAKING put forth by The Board of Directors of the Amateur Radio Safety Foundation, Inc., Loring Kutchins, W3QA.

I am new to amateur radio but, having read both proposals, arguments and explanations I believe the RM-11831 will wreak havoc upon our emergency response communications, put a halt to innovations in radio communications in the United States, remove an important safety net for blue water mariners worldwide and would have many more unintended negative consequences.

I understand that in an emergency, all forms of radio communications can be utilized but, exercising our disaster response, testing and improving our capabilities, making important connections, involving all stakeholders, enabling *accurate* information transmission must be done *before* the disaster strikes. Communications is the most common failure during disasters when rapid situational awareness is required to save lives and property. Software such as Vara, Winlink and others, make it possible to send much larger amounts of information, much more accurately and quickly than voice communications. Restricting the frequencies utilized for RTTY/data would increase airwave congestion during exercises and tests of our capabilities. These restrictions and congestion would thus occur, and be much worse, in real world disasters. We do what we practice.

As far as monitoring of digital transmissions go, Loring Kutchins’ explanation of why RM-11831 is over reaching is excellent:

“*The requirement is overreach because stations can be readily identified by monitoring, and because Amateur radio data systems can and do provide a more efficient, less expensive, accessible and fully documented method to monitor communications than listening on-air.4 Specifying on-air eavesdropping as the only acceptable means of monitoring digital stations is excessively restrictive and may result in incomplete results that aren't accurate. It also will not stand the test of time amid continuing improvement of the state of the radio art.*

*4 For example, see https://winlink.org/content/amateur\_radio\_message\_viewer . Full message content, including all attached files are available to view with documented date and time, source, gateway and destination, software used, etc. Since message content is openly available, this is proof of no “intent to obscure”, which defines “encryption” according to the FCC. “Effective encryption” is a false claim if all content is easily available and readable by anyone. Furthermore, this monitoring method entirely meets the requirements of Parts §97.113(a)(4) and §97.119(a). Digital station session logs at each radio endpoint also record transmission and session information.”*

It takes skill and knowledge to monitor CW. It takes skill and knowledge to monitor data. Both can be done. <https://winlink.org/sites/default/files/rm-11831_motion_to_dismisspetition.pdf>

Thank you,

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