

PACTOR FCC Comments
April 2019

OPPOSED TO to RM-11831.

We are licensed ham radio operators and opposed to this FCC change. As oceangoing sailors and licensed merchant mariners, we rely on WINLINK and our ham radio with a PACTOR modem for weather files and to report our position data to WINLINK when sailing offshore worldwide.

Amateur radio operators designed and built the PACTOR system and the world wide network which is run by Ham volunteer radio operators with hundreds stations within the U.S. and throughout the world. If the FTC changes this rule, it would destroy this volunteer network and adversely affect the system to the detriment of many users. All of us will be deprived of reliable offshore data communications which we rely on for weather forecasting and other essential services.

As a cruising US Sailboat, we send and receive digital messages via PACTOR to Winlink when off-shore and beyond the range of cell and VHF communications. This is critical for safety of our lives and property — critically useful in emergencies as well as for obtaining vital weather information while at sea.

We also use the technology, which this proposal would cripple, to relay emergency messages on behalf of other vessels in distress and to aid and pass on US Coast Guard and other security forces information. Sailing vessels that use this technology are self-sufficient for power generation and signal transmission and can operate when other general power and communication lines are out of service.

In addition to our comments above, we believe the interruption to continued digital communications by amateur radio operators will negatively affect U.S. national security. Amateur radio operators (hams) provide needed rescue communications using the means that would be interrupted by adopting this proposal. Hams transmitting data are essential during natural disaster, such as hurricanes in Puerto Rico, and other emergency events that disrupt traditional means of communication.

We live in a rural waterfront community in southern VA on the Chesapeake Bay. We regularly experience power, cell phone, and telephone outages and are reliant on local ham and emergency 1st responders using PACTOR modems and protocol to provide communications during emergencies.

DO NOT adopt RM-11831.

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