**Rebuttal to Comments from Jame E. Whedbee re: RM-11831**

I am William H. Axelrod, a licensed Extra class Radio Amateur Operator, K3WA. In reading Mr. Whedbee’s comments it is obvious that he either misinterprets or does not understand the comments of those who favor RM-11831. The key comments that are inaccurate are (yellow highlighted):

This rulemaking proceeding and the entire anti-digital communications push are explicitly rooted in inertia against furthering the state of the art...the touchstone of amateur radio.

RM-11831 and its proponents are in no way anti-digital communications, nor do they represent inertia against furthering the state of the art. Many of us, including myself, actively use state of the art digital modes on a routine basis. Some of us, myself included, are alpha testers for state of the art equipment and modes. No, our support for RM-11831 is not based in an anti-digital mindset; rather it is based on three fundamental issues:

1. National Security – Allowing proprietary, wide band data communications that are effectively encrypted without an available public decoder from autonomous transmitters on the amateur spectrum that cannot be “read” by others than those who have, or have purchased, the proprietary software.

2. Science, Technology, Engineering and Math. (STEM) – Impacts of unlimited wide band data (or other) signals will likely cause younger amateurs to rapidly loose interest in amateur radio with a potential corresponding lessening of interest in pursuing STEM careers.

3. Impacts on the Amateur Radio Service – In addition to the STEM issue, operation of encrypted communications, especially in the parts of the spectrum allocated to narrow bandwidth modes which include the most modern digital modes, is detrimental to the amateur radio service and  will likely cause younger amateurs to rapidly loose interest.

That bypassing commercial means of email is impermissible.

I do not see this is an issue. No one who I know who supports implantation of RM11831 makes this his or her argument. Having said that, amateur radio does not exist to support commercial interests. We should be careful of a slippery slope that blurs that line.

Many past proceedings of the Commission, including the adoption of the 60-meter band's digital emissions, expressly and openly discuss (with the Commission's support, I'd add) interfacing amateur radio with federal emergency management communications to facilitate email exchanges tending to support emergency communications

Again, I do not see this is an issue. No one who I know that supports RM11831 makes this his or her argument. Using or not using radio-based email is not the issue, the issue is the use of encrypted wide band emissions by autonomous transmitters that do not even listen for frequency use before transmitting.

As for the national security aspect of Mr. Rappaport's comments, there's nothing to his concerns

That is his opinion – and he seems oblivious to the threat. Providing another encrypted path for narcotics traffickers, terrorists, etc. to communicate is a worry for the entire intelligence and communications communities.

I am a former military node center operator. If amateur radio operators were engaged in anything remotely associated with the national security of the United States, the intelligence and law enforcement community would have addressed that with the Commission and the licensee concerned would have been dealt with in a fashion that would leave zero doubt in the rest of the amateur radio community that such behavior is intolerable.

I am a retired Naval Senior Officer. My last posting before my retirement was as the Director of Command and Control for the U.S. Pacific Fleet. I must say that following FCC rulings for Amateur Radio was the last thing I had on my work list. Having said that, if encrypted communications in the amateur bands was available, we would never know because it would be encrypted.

if Mr. Rappaport is interested in STEM education from the standpoint of the students, he'd already know that the kids these days are WANTING to use ham radio for digital communications, including and especially email...if for no better reason than to use a means of communication their parents may not yet fully understand!

This statement misses the mark by a mile. No one considers email a leading edge technology today. My grandchildren, who are all in college or beyond, have not focused on email for years. Many have left texting behind. Their parents understand email. Their children do get excited by the new digital modes, to integration of digital technology with their radios, to the fun of using software application with their everyday operation. That’s simply not email.

In summary, I fully reject the notion that RM-11831 represents an “anti-digital culture” or any push-back against digital communications. I strongly support the adaption of RM-11831.

Respectfully, William H. Axelrod K3WA