Dear FCC:

Please find an email exchange below that I sent to several ARRL board members and influential amateur radio operators, as well as to some FCC officials, calling attention to the push back of visibility to email over Winlink.

This correspondence illustrates how Winlink users have long expected privacy, and shows how Winlink users are urging to keep email private over amateur radio.

Below is an example of how those interested in Emergency Communications have long relied upon “security through obscurity, ” yet this fact has not been admitted publicly by ARSFI or Winlink in the subject proceedings that strive to remove the baud rate speed limit and which would greatly expand the available spectrum or available number of users for data usage.

I urge the FCC and ARRL leadership, as well as ARSFI/Winlink leadership and users, to bolster and reinforce FCC Part 97 rules that ensure the Amateur Radio Service is able to self police itself, by insisting upon the data transparency as requested in RM-11831. Furthermore, the email below should give credence to why NPRM-16239 and RM-11708 should not be acted upon until there is first a publicly-available decoder for all data transmissions in amateur radio, such that all data may be openly intercepted over the air.

The FCC also should note that email is being generated and carried to countries over amateur radio spectrum (via Winlink) that do not have 3rd party agreements with the USA.

I encourage the FCC and leaders in ARRL and ARSFI/Winlink to consider the historical issues described below, and to work to ensure that all data traffic be available for public intercept, so that the meaning of all messages are not obscured when copied over the air. This requirement is clearly taught in Part 97.113, and in 95-2106 and in 13-1918, and elsewhere in FCC Part 97 rules, and is the only way the public can engage with the hobby, and is the only way that amateur operators can engage with each other in experimentation.

SCS has offered to make a decoder available for pactor, and if this were publicly available for general public use, as are all other data modes in amateur radio today, it would be a great contribution to the hobby. Winlink leaders will hopefully take that offer as a good approach for their own modulations and messaging, in order to comply with Part 97.

Also, please proceed with the formal complain that several amateur operators filed with Laura Smith of the FCC Enforcement Bureau, which expose some of the problems that have been occurring for decades over Winlink, but have not been acknowledged to date by ARSFI.

With kind regards,

Ted Rappaport, N9NB

**--------------------------------------------**

**From:** Ted <[tsrwvcomm@aol.com](mailto:tsrwvcomm@aol.com)>   
**Sent:** Friday, May 24, 2019 5:45 PM  
**To:** Fred Hopengarten <[hopengarten@post.harvard.edu](mailto:hopengarten@post.harvard.edu)>; [K3ZJ@arrl.net](mailto:K3ZJ@arrl.net); [rjairam@gmail.com](mailto:rjairam@gmail.com); - B2X W2Ru <[hippisley@gmail.com](mailto:hippisley@gmail.com)>; John Crovelli <[w2gd@hotmail.com](mailto:w2gd@hotmail.com)>; [k3lr@k3lr.com](mailto:k3lr@k3lr.com); [rkolarik@neb.rr.com](mailto:rkolarik@neb.rr.com); [hdwhite@charter.net](mailto:hdwhite@charter.net); [k1ir@arrl.net](mailto:k1ir@arrl.net)

**Bcc**: Julie Knapp, Matthew Berry, Ajit Pai, Donald Stockdale, Michael Ha  **Subject:** Fwd: [winlink-programs-group] Re: Message Privacy and Public Viewing

Dear leaders of ham radio:

See the proof (below) of the monster that ARRL created when it allowed Steve Waterman and Vic Poor (Winlink founders) to run roughshod over Pete Martinez (inventor of Amtor) and Skip Teller when the ARRL "ad-hoc HF digital committee" worked with FCC's WTB in the late 90's and early 2000's to allow data into ham radio.

You have the power and authority to end this harmful and illegal use of amateur radio -- please urge the FCC to stop the improper security and privacy over the amateur radio airwaves.

Please work to stop the "security through obscurity" that has been expected by ham emcommers who use Winlink. It is on clear display below!

Winlink and ARSFI have never admitted this, but you can see below how the Winlink community has always enjoyed and expected its private, effectively encrypted data transmissions! They expect this and enjoy it, even though such data transmissions are forbidden in 13-1918 and 95-2106 and FCC part 97.113, and elsewhere.

RM-11831 must be enacted, as it is vital for the future of amateur radio.

There are so many long standing and blatant violations of Part 97 rules and violation of FCC's 95-2106 and 13-1918 by ARSFI and Winlink.

Thank you for getting up to speed on this and stopping this abuse.

Ted Rappaport   
  
Sent from smartphone, please excuse typos

Begin forwarded message:

|  |  |
| --- | --- |
| **Subject:** | [winlink-programs-group] Re: Message Privacy and Public Viewing |
| **Date:** | Fri, 24 May 2019 12:46:53 -0700 (PDT) |
| **From:** | August Johnson [<augjohnson@gmail.com>](mailto:augjohnson@gmail.com) |
| **Reply-To:** | [winlink-programs-group@googlegroups.com](mailto:winlink-programs-group@googlegroups.com) |
| **To:** | Winlink Programs Group [<winlink-programs-group@googlegroups.com>](mailto:winlink-programs-group@googlegroups.com) |

I don't see the requirement to "log in" as much of an increase in security. I also don't understand how Winlink can justify logging and posting Peer-to-peer messages that don't pass thorough anyone else's equipment. That in itself is a massive decrease in security.

Why the hell is Winlink playing "Big Brother" with simplex peer-to-peer messages? What once was just passed over a local VHF path and was gone in an instant now stays on an Internet site for 21 days for everyone worldwide (or worldwide Hams if login needed) to view.

I don't see any of our served agencies here in Linn County Oregon finding this in any way acceptable. As Hams, it's been reluctantly accepted that "security through obscurity" was all that we could offer. Now we find that most of that obscurity has been removed.

August KG7BZ