Filer's / Author's

Admiral Edmund P. Giambastiani, Jr. U.S. Navy (ret)

Seventh Vice Chairman of the Joint Chiefs of Staff.

Call sign: N4OC and licensed since 1962.

My comments pertain to the Kolaik petition FCC ID 10091881205. I request you expedite and implement RM-11831 and reject RM's 11708, 11759, and 16-239. Two fundamentals apply with regard to this filing: (1) all data in amateur radio bands should be able to be intercepted, over the air by the public and (2) that automatically controlled data station (ACDS) robots be confined to HF sub-bands that don’t interfere with narrowband transmissions at the lower end of the bands. RM-11831 ensures that the identity and monitoring of data signal transmission using existing interception methods will assure that the transmission does not include inappropriate content, that no commercial content will be sent over the amateur radio spectrum, and that commercial internet or email services will not be included as required by Part 97.1, 97.3(4), 97.113(a)(5). ACDS robots have been operating illegally, by using proprietary encryption, which cannot be monitored by anyone, including the FCC. These signals interfere with CW operating and HF RTTY/Data sub-bands. I respectfully request the Commission issue a Notice of Proposed Rule Making, and modify Section 97.309(a)(4) of the Commissions rules as described in RM-11831. Thank You.

Bottom of Form