This note is in support of NYU’s rules petition for openness and data transmission in all amateur radio communication. I oppose the ARRL’s comments submitted in their NPRM 16-239 filed on 9/17/19, and I also recommend that 16-239 be entirely rejected.

Licensed since 1953, I still enjoy our wonderful hobby. I still enjoy chatting on CW, and have also become familiar with and frequently use FT8, JT modes, MSK144 and the like. All of these modes feature the ability for any amateur to be able to decode the messages, therefore maintaining complete transparency.

Though I disagree with the ARRL 9/17/19 filing, I support their board of director’s resolution that:

1) automatically controlled digital stations below 30MHz, regardless of bandwidth, be authorized to operate only within the ACOS bands designated in the FCC rules, 47C.F.R. 97.221(b)

2) digital mode stations that operate with a bandwidth greater than 500Hz, whether or not automatically controlled, must also operate within the ACOS bands designated in the FCC’s rules.

3) no digital mode station may employ a bandwidth greater than 2.8KHz in any band below 29MHz.

The existing 300 baud rate rule should be deleted only on the condition that the above provisions are put into effect.

I support the NYU petition that private encoded messages do not support amateur radio. These communications should be done using commercially available services.

With respect,

Richard Hanson, K5AND