November 13, 2019

**WT Docket No. 16-239**

Commission members:

I offer nothing more than what you have likely heard before. I suspect the petition under consideration is little more than an intellectual exercise attempting to support an esoteric theory with little or no applicable meaning.

I believe Lor Kitchins clearly and succinctly make the point in the following comments:

*“The facts are these: There is no such thing as ‘effective encryption’ and dynamic compression is not encryption, yet the opposition ignores this and continues to spread false information otherwise. State-of-the-art data compression is employed in many digital signals to optimize spectral efficiency. Further, Winlink messages sent over the air can be more conveniently read by any licensed amateur for the purpose of self-policing using our online ‘Message Viewer’ linked from the main page of winlink.org. There is no*'intent to obscure meaning'*. Messages can be easily read for full meaning both on-air and on-line. Making all this moot is this: Over-the-air monitoring of Winlink PACTOR 1-3 signals by third party eavesdroppers have been demonstrated and documented using free software available for download from*[*https://p4dragon.com/en/Downloads.html*](https://p4dragon.com/en/Downloads.html) *See the video at*[*http://www.philsherrod.com/Winlink/Winlink\_monitoring2.mp4*](http://www.philsherrod.com/Winlink/Winlink_monitoring2.mp4)*for proof. On-air copying of other modes only requires adequate software that can be developed using publicly documented technical details of the mode in question, as was done for the PACTOR software mentioned above.*

*The petition should be dismissed because there is no need for the ruling demonstrated by the petitioners. The current rules are adequate to enable self-policing of digital modes on the amateur bands.”*Lor Kutchins, W3QA, President, Amateur Radio Safety Foundation, Inc., Winlink Development Team

I agree with his closing recommendation the subject petition be dismissed.

Respectfully Submitted.

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