Before the

FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of	)	RE: WTB 16-239
	)	RM-11708, RM-11759
Amendment of Part 97 of the Commission's	)	DA 17- 1180, FCC 16-96
Amateur Radio Service Rules	)	PSHSB 17-344
to Permit Greater Flexibility	)	RM-11306
in Data Communications	)	

To: The Chief, Wireless Telecommunications Bureau, PSHSB,
AND Scot Stone, Stanislava Kimball, Paul Moon, Laura Smith

Via: ECFS Electronic Filing

REPLY COMMENT to:
The Helfert SCS comments in the FCC record as:
FCC ID: 110731917879

Having reviewed the Helfert comments before the commission, please have the following comments for consideration:

1. SCS modem Pactor-4 communications in ARQ mode are not decodable by a 3rd party listener.

   The signal is detectable via radio (meaning one can hear the signal tones through the speaker), however decoding the signal ("reading the content") is not possible because of the proprietary compression/encoding used.

   If the message content cannot be understood by a 3rd party monitor station, the important ability of the amateur radio community to self-police is eliminated.

2. Pactor-4 ARQ mode operation is required for email-via-HF systems to facilitate the automatic (no local operator) control.

   Proponents of the system use unmanned land-based systems operating under software control on an automatic basis to send and receive email now, and wish to extend this activity using the Pactor-4 encoding to boost utilization of the service. ARQ communications using the SCS modem are not decodable in any practical sense.

3. FCC endorsement of Pactor-4 would further promote misuse of the amateur radio service.

   Interest in Email-via-HF (WinMail, etc) is a misuse of the amateur radio service because it is promoted as a cost-free alternative to commercially available services (SailMail, etc). The wider bandwidth Pactor-4 mode with higher performance will attract more users to this system and in turn further the misuse of the amateur radio spectrum as commercial users opt for the lower cost option on the amateur bands compared to properly using paid commercial services.

4. WT 16-239's unlimited bandwidth is impractical for a shared resource.

   As it's worded now WT 16-239, there is no single station bandwidth limit. This means that one station could utilize use the entire segment. And in the case of Pactor-4 ARQ, the station's obscured identity means there is little downside to operating outside the allocated data segment; the amateur radio community will be unable to self-police given the transmissions are not decodable.

As an active amateur radio enthusiast of nearly 50 years, it's a destressing development especially given the assault on self-policing. While I personally appreciate the sponsor's intentions with respect to these topics, the actual implementation - as worded now - will benefit only commercial interests and unaffiliated groups at the expense of the amateur radio community.

These issues could be remedied quickly by the Commission by:

1. Reinstating a reasonable per-station bandwidth limit (ensures sharing of the finite amateur radio bandwidth)

   AND

2. Requiring that only modes fully decodable by 3rd party stations using open source, fully documented methods (ensures amateur radio operators are able to effectively self-police)

Respectfully submitted,

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