Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the matter of WTB 16-239, RM-11708, etc. – Amendment of Part 97 of the Commission’s Amateur Radio Service Rules to Permit Greater Flexibility in Data Communications.

Commissioners –

My name is Adam Bartlett, I am a licensed amateur radio operator, call sign N5YHF, and a member of the American Radio Relay League. I have significant experience in operating computer information systems and networks including wireless communication networks, and have reviewed the Helfert comments, and would like to provide the following reply comments.

I urge you to reject the proposals made in NPRM 16-239, or at least substantially reduce the impact upon Part 97 operations. The proposals currently would remove all bandwidth limitations upon the HF portions of the amateur radio spectrum while retaining those on the VHF and UHF portions. It is unfathomable that the FCC would state that there are no reasons to restrict emissions width upon frequencies with regional, continental, and worldwide propagation characteristics while retaining them on line of site bands. The reinstatement of a reasonable bandwidth limitation would cure concerns by the Amateur Radio community about the ability of nefarious actors to severely impact significant portions of the HF band across a very broad area.

Additionally, the use of undecipherable commercial modes such as PACTOR-IV do not advance or support the aims of amateur radio as found in 47 CFR 97.1. While I feel the symbol rate limit may be outdated and in need of replacement by width of signal regulations across 47 CFR 97 bands to allow us to continue to develop and research high frequency digital communications, the allowance of full ARQ mode PACTOR protocols - totally undecipherable apparently even at the nearly unlimited resources available to federal regulators and law enforcement - should be highly restricted or eliminated from part 97 operations.

If PACTOR-IV is allowed, it should be restricted **solely** to automated control data stations (ACDS) portions as found in 47 CFR 97.221, and federal enforcement efforts should be directed on those who operate outside of those areas, and CW identification requirements should be enforced for those operating in modes that are commercially restricted and undecipherable by amateurs such as the PACTOR ARQ modes. Even today, overstep by ACDS operators is an ongoing challenge for narrow band digital, CW, and phone operations. Even when allowed by STA, the ARRL and other groups with approval to use PACTOR-IV have failed to do so in a meaningful way.

Finally, the Commission should consider additional enforcement of violations of 47 CFR 97.219 and 47 CFR 97.113 subpart 5 on operators of message relay networks. It is apparent that no current monitoring of third party communications entering/exiting some relay networks are occurring as required by 97.219, and often these are operated as unattended ACDS stations. While these networks play an important part in operating our emergency communications networks as defined in 47 CFR 97.1, they also are used for avoiding commercially available communication services such as Sailmail.