

I am writing in support of New York University's rules petition for data transparency and openness in all amateur radio communication. I also oppose ARRL comments on NPRM 16-239 as filed on 9/17/19, and recommend 16-239 be rejected in it's entirety.

I have been an active amateur radio operator and ARRL member for over 45 years, first licensed at age 13. I hold an Extra Class. My current call sign is K5ZD. I am a very active operator that understands the value of diversity of interests within our hobby.

While I disagree with the 9/17/19 ARRL filing, I do agree with the ARRL Board of Directors resolution that:

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

(2) All digital mode stations that operate with a bandwidth greater than 500 Hz also must operate within the ACDS bands designated in the FCC's Rules, whether or not automatically controlled;

(3) No digital mode station may employ a bandwidth greater than 2.8 kHz in any band below 29 MHz;

I support deletion of the existing 300 baud rule only on the condition that the above provisions are enacted.

I very much agree with NYU's petition that private encoded messages have no place in amateur radio. Such communication should be done using existing commercial services.

Encoded messages cannot be monitored by other amateur radio operators or the FCC. Such communications have already seen encoded messaging being used as a private email service and even some commercial interests are advertising inexpensive encrypted email as a reason to obtain an amateur radio license.

In addition, because of the difficulty in monitoring this type of communication it can easily be done by unlicensed users!

While digital communications with amateur radio is an important aspect of the hobby, allowing it to be used as a private communication system is contrary to the very definition of the amateur radio service and can have a negative long time impact on the amateur radio service. I hope you will insure that does not happen by adopting NYU's petition.

Sincerely,

Randall A Thompson  
Amateur Extra Class licensee K5ZD