

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 its entirety.

I have been a licensed Amateur Radio operator since 1989 and I continue to be very active in several facets of the service today.

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.

Support of NYU's petition that private encoded messages should not be allowed in Amateur Radio is essential to the long-term preservation of the Amateur Radio Service. If not acted on quickly, the Amateur Radio bands are in serious danger of becoming saturated with activity unrelated to the Amateur Radio service and thus leading to the potential end of the service - one in which that is vital for emergency communications.

Sincerely,

Nathan Moreschi  
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Amateur Extra Class Radio License Holder