

December 7, 2018

Re: Support for NPRM (Docket No. 16-239)

Honored Commissioners,

I have read both the Amateur Radio Safety Foundation Inc. (ARSFI) official comments and opposition comments to this Notice of Proposed Rulemaking, as regard to expanding the symbol rate from 300 baud and replacing it with a 2.8KHz bandwidth limitation.

As a amateur radio operator (Extra Class - Call Sign N1TEN) who uses the Winlink system and its various modes of transmitting over the air data, I find that the opposition has generated significant emotional but non-germane arguments to oppose the proposal. Specifically, emotional arguments related to potential use of digital radio modes to circumvent lawful use of the radio frequency bands.

These emotional calls to block the proposal have no intersection with national security and certainly are quite at odds with leading edge federal, state and local law enforcement technical means of monitoring and evaluation. As described in the AFSI comments, the application of file compression techniques are in general use and lead to reduced RF band usage as it takes less time to transmit and receive messages between parties.

Finally, as a retired Security Manager for a major defense contractor, I was exposed to the advanced techniques of federal law enforcement and national security agencies. If they, in any way, had objections to amateur radio use of data compression techniques, they would have brought those objections to the Commission long before now. In fact, the objection of private parties at this time, is clearly an obfuscation of the proposed rule change's advancement of the art of amateur radio technology. These arguments should be discarded or disregarded during evaluation of the proposed change.

Thank you for your time to examine my support of the proposed rule change.

Respectfully,

Dennis A. Yard

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