Before The Federal Communications Commission

Washington, D.C. 20554

In the Matter of:

The Amendment of Part 97 of the Commission’s Amateur Radio Service Rules to Permit Greater Flexibility in Data Communications

WT Docket No. 16-239

RM-11708

12/10/2018

**Comments in Support and Rebuttal of Opponent’s Arguments**

I fully support the Amateur Radio Safety Foundation, Inc. (ARSFI) filing in regards to its technical accuracy, the technical necessity of adopting the proposed new bandwidth standard for amateur radio operation in advancing the radio arts, and I emphatically oppose the emotional scare stance of detractors in this matter.

Arguments supporting greater digital flexibility in the Amateur radio service:

No Amateur radio equipment is export controlled: national defense is not threatened by modern or advancing digital communications methods used by radio amateurs.

All amateur radio equipment, software and peripheral equipment, specifically interface equipment such as Amateur radio MODEMS and similar devices are readily available for purchase in the market place, and the associated software is either free or available at small cost.

Codes and ciphers are specifically prohibited by CFR 47, Part 97 and are not anywhere to be found in the Amateur radio service.

The most current and advanced Amateur radio equipment (radios) and the most advanced digital peripheral equipment (MODEMS) are for sale to any amateur radio operator. The cost of a high end radio generally exceeds the cost of an advanced digital MODEM.

Conclusion:

Advancement of digital modes in the Amateur radio service directly support emergency & disaster communication in times of commercial & Public Safety system overload or failure. Greater communications efficiency in speed of transmission and accuracy of data transfer is essential for logistic support and life safety, provided by Amateur radio.

FirstNet was created due to communications challenges during the response to the 9/11 terrorist attacks. The 9/11 Commission recommended the establishment of a single, interoperable network for public safety. Similarly, Amateur radio, in voluntary support of Public Safety efforts, must also advance in capabilities and efficiencies.

Please approve this proposal for advancing the Amateur radio digital arts, in support of emergency communications.

Thank you

Joel E. Berger

Retired:

Compliance Engineer, L and Mobile Radio (Part 2, 22, 74, 80, 90, 95) and Part 97 Amateur Radio

TIA TR-8 member, various committees

APCO (Association of Public Safety Communications Officers)

NFPA 1802 (National Fire Protection Association, Standard on Two-Way, Portable RF Voice Communications Devices for Use by Emergency Services Personnel in the Hazard Zone)

NPSTC (National Public Safety Telecommunications Council, Heinrich Hertz Award, 2016)

General Radiotelephone Operators Permit PG-11-9436

W6BQD (amateur radio Extra class license)