TO: Federal Communications Commission

Washington, DC

FM: Philip Allardice (KT3Y)

REF: WT16-239, RM-11306, RM-11708, RM-11759

Dear Sirs:

I have read many comments regarding the proposed rule-makings

referenced above. I would like to share my comments and concerns

based upon being a radio amateur since 1970 (KT3Y).

In addition, I have been involved in portable satellite communications since 1985. Such hardware is often used for remote

and disaster relief communications. The only drawback to these

systems (Inmarsat, Iridium, Thuraya, VSAT etc.) is that the user

is required to pay for service/airtime.

Free email and limited Internet service are the real appeal of WINLINK (and related systems) for recreational boaters, yacht

clubs and those using EMCOMM as a cloak.

I support technical innovations and new communications modes

(FT8 for example), but see no reason to allow essentially

unlimited bandwidth modes to invade the amateur bands under the

guise of emergency response communications.

I own property in the U.S. Virgin Islands and maintain a station

there (KP2M) so I am quite familiar with the fallout during and

after Hurricane Irma. Local hams provided incredible support

to VITEMA (V.I. Territories Emergency Management Agency) manning

the EOC 24/7 for weeks. VITEMA (plus the hospital and others)

owned Inmarsat, Iridium and VSAT hardware so long distance communications was not the main problem. It was the lack of

trained manpower and a robust local VHF repeater network to link islands. Such a system is now being deployed by local hams who designed it after being awarded grant funds.

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The technical improvements in satellite, cell and HF communications

during my career have been immense. Satellite terminals have shrunk from the size of a steamer trunk to being held in one's hand. The cost of airtime has been reduced by a factor of over 100X to

pennies a minute.

Such innovations are a product of technology, often driven by

amateur radio enthusiasts. There is no need to allow essentially unlimited broadband digital modes access to the amateur bands.

Within a few years, such modes will obsolete as improvements to compression algorithms and data processing will occur. In fact, allowing such broadband protocols will actually retard the development of better, more efficient spectrum usage by obviating

the need for them.

To me, it appears that the main proponents of these new rule

makings are trying to hide their real intent under the guise

of EMCOMM. It is no coincidence that the commission has received

hundreds (possibly thousands) of comments from recreational

boaters who are hams and yacht clubs. Their interest in WINLINK and related modes is clear: Free Airtime without regard to the consequences. Please do not allow them to succeed.

Sincerely,

Philip Allardice (KT3Y)

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