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I would respectfully request an exemption in 15-170 for part-97 stations. Many licensed amateur radio operators modify part-15 devices as a base for use in part-97 amateur radio service. The use of commercial off the shelf in services beyond the original purpose has help provide a base for innovation and new functions. Many amateur radio operators use part-15 wireless access points with custom firmware to provide mesh networking to other amateurs. Several areas of the country have active mesh networks that provide high bandwidth emergency and general amateur communications. Broadband Hamnet and Amateur Radio Emergency Data Network (AREDN) projects are two examples. Without the ability to modify equipment and software for service in the licensed amateur bands innovation and expansion of services will be impeded. As a licensed operator find it helpful to use inexpensive equipment that can be easily modified for amateur radio service. (With a small market base most manufactures don't have specific products to fit our needs.) I would like to see language to allow continued use of part-15 devices within part-97 rules by licensed operators.

In addition some of the custom part-15 open-source projects (Open-WRT and DD-WRT) have provided a springboard for amateur radio operators, as well as others to have advanced features and security. Few users are exceed the part-15 power or channel limits. Rather, some use the custom code to offer hot-spot Internet services to guests of small businesses. (without needing a server on-site) Most vendors fail to provide security patches one to three years after hardware release, with the only option to purchase newer models with the patches applied. Open-source has fixed issues and enhanced services for years. I strongly support having rules in place to not exceed part-15 rules. However, blanket prohibition on non-vendor supplied software could seriously limit options for many legal uses.

--Shane Godmere, KA8QZH