

August 24, 2003

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Comment on RM-10765 and Proceeding PRM03ET

Petition For Rulemaking To Establish, Administer, and Regulate The Homeland
Public Press And Information Widecast Service

Dear Sir or Madam:

I respectfully submit the following comments in support of Proceeding PRM03ET
and RM-10765.

Background

Radio Teletype as a means of communication served as the primary means for disseminating news and weather information throughout the world for a period of over 60 years. It further served as a primary means of communication for our Military during two world wars and the Korean and Vietnam conflicts. It's long running success was due to its robustness as a means of communication, and, unlike radio transmissions of voice, Morse code, or video, it inherently produces a permanent written record of the information transmitted.

Today, the Internet and high speed secure data networks have largely replaced Radio Teletype. While these newer communications vehicles offer much higher speeds and bandwidth, they are vulnerable to outage due to power failures and security compromises of the Internet, and fail to offer the key advantages provided by radio Teletype: 1) robustness of the communications mode and 2) an inherent written record provided of the information communicated.

Public Security Considerations in a Regional or National Emergency

In the post 9/11 domestic security environment, there exists a need for multiple robust forms of communications of news, weather, and Department of Homeland Security alert status and advisories to the public at large. Multiple channels are desirable because such infrastructure channels as the Internet, and traditional AM/FM radio broadcasts and TV can be compromised by major regional power outages as occasioned by inclement weather or as was recently shown, through a failure of the power grid over a large portion of the contiguous United States.

With traditional AM/FM radio broadcasts or television, an individual must be present and tuned in at the time the information is transmitted in order to hear what is broadcast by voice or image, or use automated recording equipment such as a video tape recorder. The Internet requires the user to have computer equipment, a modem, and access to a functioning telephone line, TV cable, or home satellite receiver, and a functioning Internet provider as a portal to the network. Furthermore, AM/FM broadcast radio, television, and the Internet are all dependent on the normal functioning of the electrical power grid. Many communications infrastructure facilities do not have back-up electrical power generators for use in the event of a large-scale electrical power failure.

In the event of a National Emergency coupled with a wide spread electrical power outage, many of the sources, as well as transmitting and receiving devices, for news and weather information become unavailable. Thus radio and television broadcast stations may not be able to obtain up to date news, weather, and Department of Homeland Security alerts and advisory information from their primary sources during such an emergency.

Radio Teletype Widecast transmissions on the high frequency radio band (2 to 30 MHz) have the ability to provide a backup means for disseminating news, weather, emergency information, and Department of Homeland Security alerts and advisories, throughout the United States from a small number of transmitting stations. Radio Teletype Widecast service can provide this information throughout the United States on a continuous basis without depending on the country's traditional infrastructure including the electrical power grid, the Internet, the telephone system, and the thousands of individual AM/FM Broadcast and TV stations in the US.

Traditional AM/FM radio broadcast stations and television stations depend, themselves, on the Internet and the telephone system for their news, weather, and emergency information sources. In a national emergency or large regional power outage, many of these stations would not have access to news or emergency information. However, one single Widecast station anywhere in the United States with access to news and Homeland Security alert status and advisories can feed all other Widecast stations through its radio Teletype transmissions.

Simple Equipment for Reception

Today, the reception of radio Teletype signals by the general public no longer requires expensive, heavy, and complex specialized equipment. Any personal computer or lap top computer with a sound card can receive radio Teletype signals using free and widely available software and a short wave radio receiver. Short wave radio receivers are now available in the form of a moderate cost computer card that plugs into any personal or laptop computer. Further, low cost, battery operated short wave receivers are widely available. Suitably equipped, any laptop computer becomes a portable, battery operated, radio Teletype reception system.

Additionally, many ham radio operators, short-wave radio enthusiasts, and Teletype enthusiasts have existing and fully operational radio Teletype equipment in their possession at the present time. As demonstrated by the survey that accompanied the Petition for Rulemaking as an appendix, there were a large number of individuals who regularly copied the experimental Widecast service during the 2-year term of its Experimental License from the FCC.

In the event of a National Emergency accompanied by a wide spread power outage or compromise of the Internet, radio Teletype transmissions provided by the Homeland Public Press and Widecast Information Service could provide an important source for news and emergency information while other means of dissemination of news, weather, and Department of Homeland Security alert status and advisories were unavailable or inoperable.

Current Printed News for the Blind

Blind people today depend primarily on AM/FM radio broadcasts and Television for news and weather. Unfortunately, this requires the individual to be present and tuned in to receive this information. Also, if something is missed or misunderstood, there is no copy available for review. Radio Teletype transmission can be printed using a Braille printer thus creating a permanent

record of the information which can be read or re-read at ones leisure. The Homeland Public Press and Widecast Information Service would provide a practical and inexpensive way for blind people in the US to receive regular, up to date, current news and weather information in a printed format on a daily basis; a virtual newspaper for the blind.

Due to the fact that the average number of blind people within the listening range of the typical AM/FM broadcast station is small, it would be impractical to offer such a service on a local basis. However considering the national audience that could be reached by the Homeland Public Press and Widecast Information Service transmitting on HF radio frequencies, provision of printed news and information service for the blind is immanently practical.

Since many Internet web pages for news and information contain a great deal of graphical content, they are not generally suitable for printing with a Braille printer. The "text only" nature of the radio Teletype used by the Homeland Public Press and Widecast Information Service makes it ideal for printing on a Braille printer.

News and Information Service for Off Shore Fishing Vessels and Pleasure Craft
When an off shore fishing vessel or pleasure craft is out of range of local AM/FM broadcast radio and television, there is no current means provided for the reception of alert status and advisories provided by the Department of Homeland Security, even though such information could be critical for a vessel planning to enter a US port. The Homeland Public Press and Widecast Information Service would provide a practical and inexpensive method for off shore vessels to obtain this important information, news, as well as an alternate source of weather data and storm warnings.

News and Information Service for Recreational Vehicles, Motor Homes, and Long Haul Trucks

By their very nature, vehicles such as recreational vehicles, motor homes, and long haul trucks spend a great deal of their time in motion where the only access to news, weather, and emergency information is through radio or television. No permanent record or printed copy is generated for reading or available for consumption at a time other than at the time it was broadcast. The Homeland Public Press and Widecast Information Service would provide for reception of printed news media, weather, and emergency information in moving vehicles on a national basis by tuning to one of several standard HF frequencies while underway.

Summary

In summary, the proposed Homeland Public Press and Widecast Service provides for a host of needs not presently being met by the standard communications methodologies currently in use today. In a period where the transmission of emergency information to the public at large may save lives and prevent injury from causes as varied as terrorist attack or off shore hurricanes, the proposed Homeland Public Press and Widecast Service would provide an alternative communication channel capable of reaching the public on a national basis from only a few transmitting stations which are not dependant on the proper functioning of large scale infrastructure such as the electrical power grid, national telephone system, and Internet. As such, the Homeland Public Press and Widecast Service would be a vital element in our overall security and communications apparatus that would insure the ongoing provision of news, weather, and emergency information when other more infrastructure dependent communications channels were unavailable. I respectfully ask for the

Commission's full support and approval of this important new service and support to our Homeland security.

Sincerely,

Roy H. Norris
President