

I enter the following comments in support of RM11392

- 1) This proposed rule reestablishes the balance of spectrum use in the Amateur Service between the automated user community and the live human to human communications community.
- 2) Establishes set-aside frequencies for experimentation and investigation of new technologies in a dedicated spectrum assignment within the current Amateur Service Spectrum assignments.
- 3) Places realistic limitations of individual use of a scarce spectrum resources based on engineering analysis which demonstrate that these limitations do not overly constrain or reduce the effectiveness of incumbent users.
- 4) Establishes a new lexicon to accurately describe modern modulation techniques which recognizes computer generated modulation schemes.

As a companion matter not addressed in this proposed rule, the issue of encryption or defacto encryption of amateur communications by use of a proprietary modulation technique has not been addressed. The modulation format identified as PACTOR III is a closed proprietary scheme which is available only from SCS GmbH & Co. As a practical matter, use of this modulation form creates a defacto encryption of Amateur communications which precludes peer monitoring of communications which has been a long held tradition in the Amateur Radio service.

RM11392 should be expanded to include clarification of long standing Amateur Radio traditions that all communications, including automated systems, must be unencrypted and open to monitoring by all Amateur radio operators. A requirement should be imposed on all automated systems for public release of modulation and data processing details sufficient to allow all licensed amateur radio operators to monitor traffic flowing through these systems.