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Federal Communications Commission  
Electronic Comment Filing System

Re: Proceeding number RM-11699

Dear Commission,

I am an appointed physician Faculty member at the University of Arkansas for Medical Sciences as well as an Amateur Radio operator and write to you in support of Mr. Rolph's request in RM-11699.

1. Is there a necessity for encrypted data transfer?

As a physician who also has to support emergency treatment at my facility, I have to agree that there are a multitude of professional situations which could necessitate relay of sensitive information, some of which may be HIPAA related <http://www.hhs.gov/ocr/privacy/> in regards to patients, some of which is in regards to head count on victims, needed supplies, detection of radiation etc., which should not be read by the general public and the media but which is intended for example for the CDC, NRC, FEMA etc..

2. In which situations may this be needed?

Communications abilities may be severely affected in Hurricane Katrina like scenarios (here in Arkansas where I am located, a New Madrid Fault Line event is probably the most likely severe event with the USGS having issued a fact sheet reiterating the estimate of a 10% chance of a New Madrid earthquake of magnitude comparable to those of 1811-1812 within the next 50 years, and a greater chance of a magnitude 6.0 earthquake in the same time frame. <http://pubs.usgs.gov/fs/2009/3071/>

3. How could such encryption be performed, without obscuring the sending and recipient stations?

In regards to "how" such encryption could be performed, as to allow traceability of who sent information to whom, I would propose that encryption be allowed on the content level (i.e. encrypt the text being sent) and not on the transport level (i.e. transfer mode itself is not an encryption mode as found in commercial transceivers), with proper station identification in compliance with 47 CFR § 97.119 (a).

This is analog to an encrypted email, where the sender and recipient are clearly identified, the content however could be encrypted with a program like PGP/GPG

[http://en.wikipedia.org/wiki/GNU\\_Privacy\\_Guard](http://en.wikipedia.org/wiki/GNU_Privacy_Guard)

### 3. Discussion

Secondary to the above I thus see sufficient necessity and technical possibilities to consider allowing encrypted information to be transferred by Amateur Radio Operators, with only minor changes to the current 47 CFR 97, given that the likelihood of a severe natural event can be considered as high for my area and given that sensitive communication may well be a necessity to ensure the safety of life and protection of property.

Disclaimer: These are my personal opinions and may not reflect the opinion and views of my employer. I have no conflicts of interest to declare.

Sincerely yours,

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