

I oppose the Petition for Rulemaking referenced by RM-11699 for Encryption of Amateur Radio Communication.

People can defend the position of wanting encryption through the use of words as security or sensitive.

First to address people's use of HIPPA in reasons for encryption. HIPPA applies to health care providers, not Red Cross, Salvation Army, or CERT. Allowing agencies themselves to classify information as sensitive is poor to implement as everything will be "sensitive".

If all communication is down AND if the need arises that a patient information needs to be provided to another entity, there are other methods with the simplest being courier. If transporting a patient from location A to location B, provide an identifying number with the patient. Location A keeps a record of the number and location B is provided the number, and the patient has the number with them when delivered to location B.

Working with EMS and fire services for the last 18 years, we have never been in a situation where patient identifying information needs to be provided to a receiving facility. I make reference to this that at no time using any communication method has patient identifying information been provided to a receiving facility. The patient's condition, vitals, and age will be provided but their name is not. The patient's name and association of other vital information together makes the data as a whole sensitive. Refer to previous paragraph to make data non-sensitive.

Amateur radio is for the open communication and as a side bonus able to help agencies during emergencies when standard communications fail. These agencies are used to working with communication methods that are generally secure. They need to develop alternate plans to provide patient necessary information in a sanitized form for times of their standard communications being disrupted. Amateur radio should not cover for their lack of preparation.

Sincerely,
James Rayburn
W3JIM