

RE: RM-11699 Encryption of Amateur Radio Communications

Synopsis: Under no circumstances should RM-11699 be accepted to allow encrypted communications

Reading:

The request for rules change should be discarded in its entirety. The proposal asks for exceptions to the encryption of radio communications on the Amateur frequencies.

I work in the medical field. HIPAA mandates that personally identifiable information cannot be transmitted unencrypted. This would include Name, DOB, SSN, and MR number (medical record number). What it does not prevent is what happens every day in our EMS dispatches across the country: "We have a 42 year old woman who is having trouble breathing and is dizzy. She is at 1234 State St., Apt 2". That message from dispatch is not a violation of HIPAA, and it happens all the time. It does not identify who it is, just where they are. The need for encryption in this context is non-existent.

Amateur Radio is effective because volunteers not only have the equipment necessary to provide communications in the times of disaster, but they have the willingness and desire to help as well. It works well, because its essentially a party line way of communicating (which the Skywarn members have shown time and again to be vastly superior to individual phone calls to the NWS).

If you make encryption selective, as this RM does, then not only do you de-incentivize many operators from participating, but you also create a group of "first class" operators who are special because they are able to use encryption. The creation of a special class of operator will result in less participation overall, and individuals who are volunteers will not feel their participation is worthwhile.

If we see a need for encryption between hospitals in times of emergency, they can do what public safety has done for years – license a range of the spectrum outside of existing allocations and use it.