I am writing in opposition rule making review RM-11699, which proposes to allow encryption by amateur radio operators when operating under amateur radio regulations in certain situations.

The amateur bands are an open, collaborative environment with communications that clearly align with the hobby, including its variations, that many hams enjoy. Even if operating strictly in accordance with the proposed regulation, the presence of encrypted communications on the band will change the nature of operation for hams as well as the confidence in the innocuous nature of ham radio by other observers.

Although ham operators can and do assist in emergency communications, the use of unencrypted communications has served this purpose well for decades. In any case where the desire for encryption would be pertinent to such communications, other means of transmission should be available. Any party that does not wish their information or situation to be available on open airwaves can opt out and find another means to convey the message or convey a message with less, but sufficient, information to avoid divulging anything more sensitive than desired.

Encryption is a natural part of commercial, government, law enforcement, telecommunications and other services on the airwaves. Encryption is inconsistent with the nature, purpose, and intent of amateur radio. The benefit in a few situations is far outweighed by the change in both actual contents of the airwaves and the impression of those communications by any listening third party, including governments and law enforcement agencies around the world.

I strongly oppose any use of encryption on the amateur bands (as part of amateur operations, other shared services on those frequencies would have their own rules).

Nothing in my comments should be construed against the use of digital or well defined encoding methods, provided that the method is publically documented and allows any equipped listener to decode the messages or potentially participate in such communications. In other words, non-cryptographic encoding (e.g., FreeDV, PSK, RTTY) is acceptable to me on the airwaves.

However, if a cryptographic technique was used, or if the encoding was not publically documented with reasonable access to necessary decoding software (obscured transmission, though not encrypted) I am opposed.

Thank you for the careful process in rulemaking and considering my comments in this matter.

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