

I have been a radio amateur for over forty years and have been involved in Amateur Radio education for much of that time, having published over 100 amateur radio articles and two related books.

The referenced proposed rulemaking to allow encryption on Amateur Radio frequencies is ill-advised and contrary to the very nature of Amateur Radio. The original prohibitions against cyphers since the beginning of the service were well thought out, and there is absolutely no reason to change this doctrine.

Amateur Radio is primarily an experimental and scientific hobby, the ability to pass third-party traffic is incidental, and in many nations actually forbidden. Amateur Radio should never be in a position to compete against existing commercial entities; there are sufficient commercial services in every jurisdiction on Earth to perform these services. The FCC was very wise in keeping Amateur and Commercial regulations entirely separate. Amateur Radio should be preserved for those functions for which it was created, and for which purposes ONLY Amateur Radio can serve; primarily scientific exploration, experimentation, training of communications and technological experts, and *advancing the state of the art*, as spelled out in FCC 97.1. Performing third party traffic is secondary and is valid when there are no commercial services, or during emergency situations when such services are compromised.

The argument that the rules must be changed to accommodate modern encryption methods is specious. Encryption and cyphers of all sorts were available since the days of land line telegraph; they were forbidden on Amateur bands because of the unique purpose of Amateur Radio: the free exchange of information, not the obfuscation thereof.

One of the expressed purposes of Amateur Radio is to promote *international good will*. Amateur Radio has enjoyed the ability to exchange communications with varying degrees of freedom around the world, specifically *because* such communications were open and plain. The use of encryption on Amateur Radio frequencies in itself will tend to arouse suspicion of all parties involved, greatly compromising Amateur Radio's unique capabilities of international good will communications. Amateur Radio needs to retain its unique capabilities in this aspect. Again, there are more than sufficient commercial vehicles for those cases where encrypted communications are deemed necessary.

It is safe to say that nearly every Radio Amateur of long standing has extreme reservations about this proposal. Many of us have dedicated a lifetime of experience and expertise to preserving the unique capabilities of Amateur Radio, changing our methodologies to accommodate technical advances, but never abandoning the fundamental doctrines of Amateur Radio.

This proposal, on the other hand, is in direct opposition to basic Amateur Radio *doctrine*, and the very purpose of Amateur Radio. My recommendation is that this proposal be summarily dismissed, as well as any future proposals to violate this crucial fundamental aspect of Amateur Radio.

Sincerely,

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