

Reply comments on RM-11708

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I would like to address the apparent lack of knowledge by numerous hams that have commented in opposition to the current proceeding, most specifically Mr. Charles Young, regarding Winlink 2000.

Despite comments to the contrary, Winlink 2000 Radio Message Servers running RMS Trimode on HF do currently possess the capability to not transmit if a signal is detected in the passband of the RMS station for all modes enabled on the RMS; whether or not it actively detects a transmission is a much more complex action than many assume for the following reasons:

- 1) Position of the narrow bandwidth transmitter in relation to the RMS transmitter antenna
- 2) Type of antenna in use at all stations
- 3) Directionality of antennas used

When busy channel detection works, it works very well; it can successfully prevent interference 80% of the time. The 20% of the time it fails to prevent interference is directly related to the above three points; a narrow bandwidth transmitter using a directional antenna pointed in the same direction as the RMS antenna that is located in the null off of the end of the RMS antenna will quite likely not be detected, no matter how sensitive the busy channel detector is.

Despite the claims of Mr. Young, Pactor 3 is not the only mode used on HF by Winlink stations; the WINMOR protocol developed by Mr. Gerald F. (Rick) Meuthing is also commonly used as one of the protocols, sometimes by the same RMS Trimode station that is running Pactor 3. This protocol did not exist 10 years ago, which refutes the claim that there have been no innovations in wide bandwidth data modes in that time period that have not had a commercial (and proprietary) origin. Mr. Meuthing developed WINMOR as an alternative to the proprietary Pactor modems, as there are many people in the Amateur Radio community that refuse to spend that amount of money on a device that, while available from multiple suppliers, originates from a single source; SCS.

Contrary to Mr. Young's claims, the capability exists to screen messages passing through the Winlink system, including removing potentially dangerous file types from messages. Winlink RMS Stations are also capable of "in the clear" ID via CW.

Additionally, Mr. Young in particular doesn't make the connection between eliminating the current, extremely restrictive data rate (300 baud) and the implementation of the 2.8 kHz bandwidth cap. With the above mentioned innovations, and the planned enhancements for WINMOR that are contingent on the 300 baud data rate being eliminated, those same 1000 hams that can use narrow bandwidth sound card based modes can also use the exact same hardware to utilize the faster data rates with the simple addition of a new piece of software. The elimination of the data rate cap will also allow the use of additional narrow bandwidth data modes on HF that were developed by Dr. Taylor for use on VHF and UHF.

A number of comments have brought up the subject of Digital Voice; while I agree in principal that it is a data mode, rather than a "Voice" mode, I do not see that it, or any other "wide bandwidth" data mode has any place in the Single Sideband voice allocation, as has been suggested. My preference would be that it and other wide bandwidth modes be placed in their own allocation, as part of a separate

proceeding, so as to not further hijack the intention of this one.

Finally, many US Amateur Radio operators do not seem to be aware that we are one of the last countries with an Amateur Radio Service to do away with the archaic “Regulation by Mode”, if not the last one. Many seem to think that the rest of the world's Amateur Radio operators would develop modes that we, as one of the largest Amateur Radio communities, COULD NOT USE. I know Amateurs in other countries that have bluntly stated that our archaic regulations are stifling innovations worldwide.