

SUMMARY OF COMMENTS RELATED TO RAPPAPORT/MARCUS PETITION
16-239

Date	Points Opposed to Goals of Rappaport/Marcus	Person	Points In Favor of Goals of Rappaport/Marcus
11/4/2019	Point by point rebuttal of Rappaport/Marcus with references to previously published data, and stations funded by the ITU	Gordon Gibby	
11/4/2019		Dave Burstein	1. Opposes "effectively encrypted or encoded messages" (with no definition). 2. States that "Boaters and RV people want to take over the ham frequencies for secure communications, discouraging others."
11/4/2019	Feels the current prohibitions in regulations are "appropriate, reasonable and should be retained" Indicates Winlink over the air monitoring has been demonstrated and documented, and the winlink message viewer provides adequate protections	Glen Reid	
11/4/2019	Winlink, Packet and other "digital" transmission modes are critical to timely and accurate disaster/emergency communications. by volunteers assisting authorities.	Bryan Hoffman	
		<p>Dennis McGough</p> <p>Raises the question of clarification of the "control operator" issues.</p> <p>Raises the question of whether computer generated information is 3rd Party.</p> <p>Requests clarification on advances in communication to allow advancements of the</p>	<p>Requests that any digital technique be sufficiently documented that amateurs can replicate the technique; author seems to believe this is not the case for some systems.</p> <p>Questions whether variable dictionary techniques allows adequate monitoring capability under "typical conditions" (did not address diversity reception).</p>

		radio art 97.1(b)	
	States that state of the art data compression is legal and has been demonstrated to be monitorable. Indicates that only adequate software is required, leveraging publicly documented technical details.	(Mistakenly filed as "New York University)	
11/4/2019	Brief comment that there is no demonstrated need for changes. Current rules adequately allow self-policing	Steven Lott Smith	
11/4/2019	Brief comment that there is no demonstrated need for change, current rules are adequate, and NYU et al just "wants WinLink to go away"	Zogail Sith	
11/4/2019	<p>Detailed comment based on previously filed comments that stations with suitable equipment should be able to read messages, and that demanding that amateur radio go back to "horse and buggy" or "Model A" communications is contrary to goals of service.</p> <p>Writer is the designer of G-TOR and of multiple tactical modems, with real world experience.</p> <p>"Quite frankly, it is my opinion that the spreading of known false information (e.g., "encryption is being use") and repeated filings of petitions by a relatively small (but highly vocal) group of anti-technology advancement people is wasteful of the Commission's time and resources and a great disservice to all amateur radio operators....."</p>	James L. Randall	
		Marvin Bloomquist PhD	Agrees with ARRL proposed limitations on digital communications. States that "private encoded messages have no place in amateur radio" (offers no definition) Cannot be monitored on a routine basis,

			used as a "private email service" and for advertising.
11/5/2019		James R. Scarbrough Jr	Wants to see the imaginary loophole that allows "encrypted services" which "cannot be decoded in real time over the air" ¹
11/5/2019	Brief comment that the "digital transmission in question can be monitored for content using simple inexpensive hardware and freely available software."	Michael McPherson	
11/5/2019		Gilbert Franke	Brief comment in favor of Rappaport/Marcus "will return the Amateur Radio bands to compliance with Part 97 rules." ²
11/6/2019	Extensively documented rebuttal of Rappaport/Marcus	ARSFI	
11/7/2019		Richard Hanson	Supports ARRL restrictions on digital communications and states "private encoded messages do not support amateur radio. These communications should be done using commercially available services." (Did not define private encoded messages)
11/7/2019		Thomas Price	Worded very similarly to some previous comments, supports ARRL restrictions on digital communications and opposes "private encoding" (Does not define private encoding)
11/8/2019		Anthony L. DeWitt	Disagrees with the WINLINK email system, despite its "ingenuity and creativity" -- believes it violates Part 97 rules and should not allow messages to connect to the Internet. Desires messages to be readable with simple software such as FLDGI or Digital Master 780
11/8/2019		Gordon Gibby (Requests commenters to define Made Up Technological Terms (MUTT) if they wish to use them to allow clear	

1 Scarbrough: Both factually incorrect regarding encryption and appears unaware of well documented recent developments.

2 Apparently this gentleman believes there are no other violations in all of amateur radio.

		communications.	
11/8/2019	Opposes new restrictions, states the FCC and Part 97 rules "need to enter the 21st century" Points out it has been demonstrated now the "moderately technically inclined" can monitor Winlink and Pactor.	Adam White	
11/8/2019	<p>Finds great irony that anyone would consider advanced digital to be a violation -- high speed CW would fit the same criteria, as would RTTY, and AM, or the Navajo language to certain listeners.</p> <p>suggests the "petitioner's reasons for making this request are highly suspect and have nothing to do with the enforcement of technical regulations....." Suggests "There may be another agenda, which may profit New York University" and asks the FCC to carefully examine the motives because "the assertions from a technical vantage point make no sense"</p> <p>Writer has been an emergency management professional for over 40 years and feels these technologies are very beneficial.</p>	Lloyd Bankson Roach	