



6143 Anchor Lane, Rockledge, FL 32955 • arsfi.org

Rick Roderick, President
ARRL Headquarters
225 Main Street
Newington, Connecticut, 06111-1400

April 11, 2019

Via email only: K5UR@aol.com and CC

Dear Rick:

Thank you again for your letter of invitation and attempt to resolve the discontent surrounding Winlink and its foes. I want to communicate that the ARRL is in peril over this.

Although many of the same players are at work now as they were in 2007, they have adopted a new strategy in RM-11831 that will outlaw all digital Automatic-Repeat-Query (ARQ) protocols on the US HF amateur bands. That means, if they succeed, no more store-and-forward technologies for US hams. No more NTSD. No Winlink for ARES. No use of Pactor 2-4, WINMOR, ARDOP, VARA and other ARQ protocols by individuals or in any system or service. No more experimentation and development on advanced ARQ modes. (Narrowband digital protocols can't substitute, and simply do not have the capacity, error-correction, dependability, durability and interoperability to succeed in real emergency applications.) Moreover, State, County and Municipal governments, Hospitals, NGOs, and agencies of the Federal and State governments and their critical-infrastructure partners will lose their ability to ship emails in a communications emergency. Their investments in equipment, training and support of ARES and AUXCOMM programs will become useless. Many, many ARRL members will be disenfranchised.

As you may know, these advanced protocols are difficult for a third-party to eavesdrop, not by design to obscure message meaning, but by the physics and natural laws affecting radio paths and the nature of the smart, spectrum-efficient, negotiating protocol between two communicating stations. If a third station wants to copy and decode the content of messages, it must copy 100 percent of the digital packets to have the information needed to successfully decode the rest of the message.

Current Part 97 rules allow these ‘specified’ advanced modes by requiring technical descriptions to be published publicly. For 23 years, this has satisfied the FCC. If adopted, RM-11831 will have impact far beyond Winlink. Opponents would have easy on-air eavesdropping trump the spectrum-efficiency and load-carrying utility of these modes, even while more efficient means to monitor traffic are available.

For many years, 25,000+ Winlink participants have self-policed their own messages using online tools that provide full access to all message content and metadata. The same tools have been available to law enforcement and interested US agencies. This kind of off-air monitoring meets the FCC rules. Beyond what the FCC now requires, we have recently made public a monitoring tool we designed for the new Volunteer Monitor Program. I have been in touch with Riley Hollingsworth about it. It can be inspected at https://winlink.org/content/amateur_radio_message_viewer or from a link on the main page, winlink.org. This certainly proves there is no intent to ‘obscure meaning’ as opponents charge. We hope NTSD, HFLink, RRI, and other automatic systems using these modes on the amateur bands do similar things, and that you urge them to.

The proposed RM-11831 requirement for ‘open source’ decoders of all specified digital codes on HF will result in commercial manufacturers withdrawing their products from the US market, or disclose their intellectual property. This goes beyond SCS Pactor modems and will do damage to the economy surrounding amateur radio.

Since 2007, The ARRL has tended to avoid controversies, attempting to walk the line and broker peace between factions of the amateur community. And now our opponents have become direct ARRL opponents. Professor Theodore Rappaport has mounted a formidable campaign against the ARRL and Winlink, employing a NY public relations firm to promote his point of view in the press and social media. I find it hard to believe that an individual ham would go so far for his hobby. I am suspicious, especially in light of his close connections with FCC officials and the the wireless industry, the money behind NYU Wireless, and the vulnerable amateur radio spectrum. The League is loosing it’s reputation with the FCC to defend amateur radio interests. The FCC has lost engineering-oriented staff that understand the technical issues. As a long-time member, I personally think it’s time for the ARRL to fight with vigor. Please investigate and be sure about Professor Rappaport before you do anything in his favor, especially if you decide to do nothing.

The 90-day delay in the FCC consideration of WT Docket 16-239 was a strategic mistake.

Please have your Directors study our arguments in opposition to RM-11831. Please support the ARSFI *Motion to Dismiss RM-11831 and Petition for Rulemaking* by filing comments with the FCC. We believe it is unlikely that we will survive without your support, and neither of us want to accept the consequences.

The comment period for RM-11831 ends on April 24.

Please see our article at winlink.org containing links to our arguments and FCC filing.

The entire ARSFI volunteer organization, its Directors, and Winlink administrators are open to your questions and invite your investigations.

Sincerely,

A handwritten signature in black ink, appearing to read "Loring A. Kutchins", with a long horizontal flourish extending to the right.

Loring A. Kutchins, W3QA
President
Amateur Radio Safety Foundation, Inc.

CC:

Tom Abernathy w3tom@arrl.org

Kermit Carlson w9xa@arrl.org

Matt Holden k0bbc@arrl.org

David Norris k5uz@arrl.org

Dale Williams wa8efk@arrl.org

Ria Jairam n2rj@arrl.org

Rod Blocksom k0das@arrl.org

Fred Hoppengarten k1vr@arrl.org

Mike Ritz w7vo@arrl.org

Jim Tiemstra k6jat@arrl.org

George Hippisley w2ru@arrl.org

Jeff Ryan k0rm@arrl.org

Greg Sarratt gsarratt@arrl.org

Richard Norton n6aa@arrl.org

John Stratton n5aus@n5aus.com

david@davidsiddall-law.com

ARSFI Board of Directors