



Comments to NOAA and USFWS
NOAA-NMFS-2021-0122
Monument Management Plan (MMP) for the
Pacific Remote Islands Marine National Monument (Monument)

January 12, 2022

The American Radio Relay League (ARRL) is the largest amateur radio membership association in the world with some 160,000 members. ARRL's mission is "To advance the art, science, and enjoyment of Amateur Radio." ARRL has been pursuing this goal since its founding in 1914.

Amateur radio operators in the United States are licensed under the Communications Act, 47 U.S.C. §§ 151 *et seq.* and governed by the Federal Communications Commission (FCC), 47 C.F.R. Part 97. By law the Amateur Service is a voluntary noncommercial service devoted to advancement of the radio art, the technical and communication skills associated with it, and the international goodwill that it brings, especially regarding the provision of emergency communications. These pursuits have led radio amateurs to travel to remote areas all over the world, including on the islands, atolls and reef that are within the Monument, for the purpose of establishing communications using small temporary stations.

One test of an amateur radio operator's skill in the design, build, and operation of a station is the ability to successfully communicate with other stations in the farthest reaches the world. In the early 1900's the amateurs' goal of communicating across greater distances drove development of technology and knowledge until amateurs succeeded in communicating across the Atlantic and Pacific oceans. The quest to communicate more effectively continues today, with amateurs employing their skills to design and build stations of increasing technical sophistication. As part of this pursuit, amateurs regularly mount expeditions to distant locations and hone their skills by establishing temporary stations to communicate with like-minded amateurs around the world.

The skills that the operators attain have served our country well when passing messages from difficult terrain during forest fires, extending communications assistance help to Caribbean islands during natural disasters, and in other emergency situations. At such times, operator skills and effective portable stations are greatly needed, and those who have honed their skills participating in expeditions are resources in teaching others how to set up an effective portable station and conduct the needed communications.

With regard to administering the Monument in particular, amateurs' pursuit of technological and practical knowledge as citizen scientists has accumulated decades of experience travelling to and communicating from environmentally sensitive areas throughout the world. Our community has demonstrated the skills necessary to be good stewards of the environment and wildlife at these rare locations. Within the Monument, amateur radio expeditions have been conducted in the last two decades on Baker Island, Johnston, Palmyra and Wake atolls, and Kingman Reef. Expeditions to other protected islands have included Desecheo, Kure, Midway, Navassa, and Swains. In addition, islands that are the territory of other nations also have been visited in the highly regulated and controlled islands around Antarctica, including Amsterdam, Peter I, South Georgia, South Orkney, and South

Sandwich. In every case, the visiting amateurs met the strict environmental and other requirements of their permits.

The knowledge and skills attained during expeditions are passed on through widely distributed videos, presentations, and peer-reviewed published articles. Indeed, radio amateur expeditions also provide a means to engage tens of thousands of others about the value of the Monument and similar locations. Amateurs usually create and post videos of their radio expeditions to the Internet and make presentations at in-person meetings that raise public awareness and educate the public about these unique locations. We endorse the suggestions in the Notice of Intent that opportunities be made for public awareness and to provide a permit system that allows visits under controlled circumstances that ensure conservation of the habitat.

In this regard, radio amateurs regularly work with Government agencies to promote the importance of their facilities and goals. For example, in 2016, ARRL partnered with the National Park Service to help celebrate the centennial of the Service and its mission to preserve the natural beauty of its parks and monuments. Through our National Parks on the Air (NPOTA) program, amateur radio operators established temporary stations across the park system that led to over a million on-air contacts that publicized the mission and purposes of the National Park Service. At the same time, these operators fit well into the mission of treating these locations as outdoor classrooms for America's youth. We were proud to be a part of the nearly 10% growth in visits to the parks and monuments during 2016.

ARRL also has a long-standing partnership with The National Aeronautics and Space Administration (NASA) and the Radio Amateur Satellite Corporation (AMSAT). Classrooms across the United States and around the globe have enjoyed direct contact with the International Space Station (ISS) through amateur radio. In these cases, radio amateurs install temporary stations at the schools, taking care to keep the educational session rich yet safe around these young students. The program, Amateur Radio on the International Space Station (ARISS), has long been a favorite program with NASA leadership despite the extremely limited space and resources aboard the ISS.

In closing, ARRL and the amateur radio community at large, is a federally licensed technical community that for decades has visited uninhabited, regulated, and ecologically fragile islands. We have an unparalleled record of demonstrating good stewardship and adherence to all regulations. Our work has resulted in widespread educational and awareness opportunities.

USFWS approved amateur radio activity as a compatible use of their refuges in its visitor service plan. Occasional amateur expeditions contribute to valuable outreach to a wide audience and have proven to have no long-term impact on the environment.

ARRL therefore encourages NOAA and USFWS to provide in its Monument Management Plan the means to continue to permit amateur radio expeditions to areas within the Monument, and to be open to more opportunities for radio amateurs to visit these areas in the future.

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