

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
)
AMENDMENT OF PART 97 OF THE)
COMMISSION'S RULES TO ALLOW)
A SINGLE POINT OF TRANSMISSION FOR)
STATION IDENTIFICATION DURING)
EMERGENCY COMMUNICATIONS)
AND DRILLS)

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To: The Commission

Petition For Rule Making

Submitted by:
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Dec. 18, 2018

I. Introduction and Background

1. Section 97.119(a) of the Commission's Rules provides that an amateur station "must transmit its assigned call sign on its transmitting channel at the end of each communication, and at least every 10 minutes during a communication, for the purpose of clearly making the source of the transmissions from the station known to those receiving the transmissions."

On December 9, 2005, Murray Green filed a petition for rulemaking; RM -

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11346, requesting that the Commission amend Section 97.119(a) to reduce the required frequency of station identification to every thirty minutes during a communication, rather than once every ten minutes. In the Commission's decision, as presented in DA 07-3069, it was noted that the public commenters on the Green petition argued: "that the current requirement is not burdensome..." The Commission concurred and additionally mentioned that "propagation may not permit continuous reception of a specific station for thirty minutes." The decision goes on to mention that the proposed rule change "would compromise the ability of the amateur service to self-police."¹ On May 19, 2006, Glen E. Zook filed a petition for rule making, RM-11347, requesting that the commission amend Section 97.119(a) to require that the authorized call sign be transmitted at the beginning and end of each transmission, and at the beginning and end of a series of transmissions between stations having established communications when each transmission is less than three minutes in duration. As presented in DA 07 - 3069, The Commission ruled against the Zook petition as "unnecessary and would be burdensome" and went on to say that "It also could lead to congestion..."².

2. Section 97.119(a) additionally specifies that for the purpose of station identification "No station may transmit "any call sign not authorized to the station."
3. Section 97.119(b)(1) of the Commission's Rules states that station identification if given "By a CW emission. When keyed by an automatic device used only for identification, the speed must not exceed 20 words per minute".
4. Although pertaining to a different service, Section 90.425 (b)(2) of the Commission's Rules states that for automatic CW station identification "The

¹ DA 07-3069 See II. A. 5

² DA 07-3069 See II A. 6

Morse code transmission rate shall be maintained between 20 and 25 words per minute.”

5. Section 97.119(d) of the Commission’s Rules allows “When transmitting in conjunction with an event of special significance, a station may substitute for its assigned call sign a special event call sign...” and the rule goes on to say “the station must transmit its assigned call sign at least once per hour...”.

II. Discussion

One of the most valuable aspects of amateur radio is its ability to be utilized for emergency communications. During local emergencies, the most common technique of passing emergency traffic is by way of an organized net consisting of a net control station and numerous individual portable stations. It is commonly accepted for stations to use tactical call signs (e.g., E.O.C., Triage, Hospital-one, etc.) This practice quickly identifies the transmitting station’s identity and, or, location to net control and listeners on the channel. Emergency communication may require that a net run for a period of hours, or even days. As required by Section 97.119(a), each individual station “must transmit its assigned call sign on its transmitting channel at the end of each communication, and at least every 10 minutes during a communication.” In a structured net, the net control station is in charge of all communications on the channel and may communicate with an individual portable station at time intervals greater than ten minutes. To follow Section 97.119(a) of the Commission’s Rules might require the portable stations to use their assigned call sign during each transmission which is burdensome and can hinder the flow of emergency traffic on the channel.

Perhaps the simplest approach to resolving this impediment to amateur radio conducting emergency communication is to allow the net control operator, or a designated station, to announce all participating station’s assigned call signs at ten-minute intervals using automatic CW identification. In alignment with Section 90.425

(b)(2) of the Commission's Rules for the commercial and public safety service, the rate can be as high as 25 words per minute. With Section 97.119(d) of the Commission's Rules allowing for stations to use special event call signs, this petition suggests that the common practice of individual stations on emergency nets using tactical call signs, along with the ten-minute assigned call sign automated station identifications originating from a single point will help to streamline emergency communications over amateur radio while satisfying the need for station identification.

III. Request for Rule Making

The potential change might be to add the following to Section 97.119(a):

"except during a local emergency network activation or drill.

(1) During a local emergency network activation or drill the net control or a designated station, is authorized to announce all participating station's assigned call signs at no more than ten-minute intervals while the net is in progress. If by CW emission, the maximum speed shall be no faster than 25 words per minute. The participating stations shall be within a 50-mile distance of the identifying station, and each individual station must self-identify by transmitting its assigned call sign at least once per hour."

Respectfully submitted,



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