Comments of Thomas P. Currie, N4AOF, in regard to RM-11826 petition filed by Robert A. Dukish, KK8DX

Mr. Dukish proposes a modification of 97.119(a) to add an exception "except during a local emergency network activation or drill" which would allow an en masse identification of multiple stations by a single designated station. "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."

I am an Amateur Extra class amateur radio operator with over forty years emergency experience in various radio services. My background includes having worked communications for the Red Cross for over 40 years. Over 40 years with REACT International, including serving as Chair of the Training Committee, and currently serving as a Regional Director. I have served with the Amateur Radio Emergency Service (ARES) and Radio Amateur Civil Emergency Services (RACES) in Kentucky and Georgia. And over twenty years as an officer of Kentucky Voluntary Organizations Active in Disaster (KyVOAD). My formal training includes all three levels of the original ARRL Emergency Communications Training program, REACT's Certified Emergency Communicator program, the Department of Homeland Security Auxcomm course, as well as FEMA ICS-100, 200, 300, 400, 700, 800 and numerous other courses.

I see no significant benefit to this proposed rule change. The current rules are not burdensome and when properly conducted I have never known the identification requirement to obstruct the flow of emergency traffic in any net.

Mr. Dukish correctly describes the common practice in emergency nets, which generally includes the use of "tactical" callsigns that describe the location or function of each station. This is a convenience, especially in long duration nets where the operators at various stations may change during the event. All amateur radio operators are aware that these "tactical" callsigns do not meet the FCC requirement for station identification and that stations are still required to identify with their assigned callsign. The common procedure is to use the tactical callsign at the beginning of a transmission or short series of transmissions and to end the transmission or series with the station's assigned callsign. This is the procedure taught by the ARRL and followed my nearly all amateur radio operators involved in emergency communications. Adding a station's assigned callsign at the end of its transmission has little or no impact on the flow of traffic on the net. In a typical emergency net it would be extremely rare for any transmission or even related series of transmissions to ever reach the 10 minute threshold requiring inserting the station's assigned callsign an additional time. A long series of transmissions does occasionally occur in logistical nets or traffic nets handling welfare inquiry traffic, but even in these nets the current identification requirements simply do not present any significant burden or impediment to traffic flow for competent operators.

It seems to me that Mr. Dukish might be misinterpreting the current 97.119 requirements. In his petition, Mr. Dukish correctly quotes the requirement as "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." If he is seeing a burdensome impediment to traffic flow, I believe he is misinterpreting the phrase "during a communication" as used in 97.119(a).

To the best of my knowledge, as an experienced emergency communicator, "during a communication" refers to the requirement to include identification when a transmission or series of transmissions exceeds the 10 minute threshold. For example, if I were exchanging traffic with the net control station continually for 15 minutes, I would be required to identify my station at the 10 minute point and again at the end. BUT if I were exchanging traffic with the net control station for 5 minutes now and then had a 4 minute gap followed by another 5 minute exchange, I would be required to identify at the end of each of those 5 minute exchanges but there would be no "10 minute" identification at any point. Even the Net Control Station does not normally encounter any need for a "10 minute" identification if the station identifies at the end of each transmission or series of transmissions.

It seems that Mr. Dukish might be thinking that all stations must identify every 10 minutes throughout a net. THAT *would* be a burdensome requirement and an impediment to smooth flow of traffic -- yet, that is basically what his proposed change would provide by having the Net Control Station or some designated station identify ALL the stations in the net at 10 minute intervals.

A further problem is that this proposal would fail to meet one of the primary intended purposes of 97.119(a). By shifting the identification from each station to everyone being identified by a single designated station there would be no way for anyone monitoring the net to know the identity of any individual station if there were any technical or procedural issues about any station. For example, if there were a dozen stations in a net and one of those stations had spurious emissions causing interference, having all the stations identified en masse by a single station would not provide any way to identify which station was causing the interference.

Bottom line: Mr. Dukish's proposal seems to be a solution in search of a problem.

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