

COMMENTS ON FCC OET 17-239 and Partial REPLY COMMENTS TO BRUCE PERENS

This comment is in reply to the FCC request in 17-215. The specific statement that covers this filing is:

"(TAC) is investigating FCC technical regulations and the processes by which they are developed to determine if increased efficiency and decreased regulatory burden can be realized while still maintaining the purposes and responsibilities of the FCC.

Regulations that should be removed because they have become outdated, inhibit innovation or would be better handled by the involved parties. What would replace such regulations if they are removed?"

It is also a reply comment to Bruce Peren's filing advocating that the FCC outsource the licensing data base and process, and changes to fees and license terms.

https://ecfsapi.fcc.gov/file/102617713456/Perens_ET_17_215.pdf

The rules section §97.19 **"Application for a vanity call sign" should be deleted in its entirety**, or else changed to only allow relatives or memorial (for deceased hams calls) club stations. **If not abolished, it should be arranged to assess a fee which covers the actual administrative costs of operating the program, with an additional amount to make meaningful contributions to the FCC enforcement of Part 97 rules in the amateur spectrum.**

The rest of the licensing rules should be retained as they are.

Right now, there are people (who may not even be active hams) that are making multiple requests for vanity call signs. This is possibly for the purpose of keeping those call signs out of the pool available for reassignment. This is very costly for the FCC to process.

Possibly legitimate requests of family members or radio clubs wishing to continue to honor a ham who has passed on should still be honored (at much lower cost).

The special event call sign program also also deserves a look too, not as radical as this.

There are certain hams that have contest super stations worth over \$100,000. They can well afford an **initial license fee of \$2000, with a renewal fee of \$200, doing a civic duty to support the FCC enforcement staff salaries.** The cost of this fee will also discourage the practice of certain hams "flipping" multiple desirable call letter sequences, to take them out of circulation.

BASIC SEQUENTIAL CALL SIGNS SHOULD CONTINUE TO BE AFFORDABLE. Bruce Peren's suggestion for a high fee on this type of license is too high. It will force **older retired people** out of the hobby. It will discourage **YOUNG PEOPLE** from participating in the hobby. We wish to **RETAIN and increase participation**, not **DECIMATE IT.** **A renewal term of 5 years instead of the current 10 years might be a good idea, but NO LESS THAN 5.** This also gives the FCC a "handle" on the enforcement by allowing the FCC to not renew a license, if the person is in violation of FCC rules. This would have been useful in the case of K1MAN, which went on way too long. Less than 5 year license terms also increase administrative costs. **Bruce Peren's suggestion of 2 years is too short.**

When I was first licensed in 1959, there was no such thing as a vanity call sign. Vanity call signs are not a basic “required purpose of the FCC”. Call signs were all sequential. If you did not like your call sign because it contained a mix of letters that were hard to recognize with heavy interference, you were stuck with it. You could also possibly roll the dice and apply for a new issue of a sequential call. But this expensive "entitlement" some now apparently feel is their "right" should pay for the FCC costs of registering and mediating the multiple claims for any given call sign issued as a "vanity" call sign. Historically, the program was expensive at first, then free for a while, then a fee was charged for initial issue, then free again.

Legal Precedent: New York state car license plates that are not sequential, or have special graphics, are charged a fee at initial issue, and again at renewal. There is no reason that the FCC cannot recover its costs and fund its enforcement by this method.

The FCC should NOT outsource this licensing data base to a private contractor as Bruce Perens suggests. There is sensitive information, such as Social Security numbers, addresses, email addresses, and such contained in the data base. Commercial contractors are notorious for selling this kind of information to advertisers, or inadequately protecting it. In the last 5 years, a health insurance company and Experian Credit Rating agency have been hacked, due to negligent IT work, probably due to allocating insufficient funds for protection, for the sole purpose of increasing profits. The FCC is not subject to the demands of stockholders and will be a responsible guardian of our information.

The FCC rule I am discussing it this one: §97.19 Application for a vanity call sign.

Respectfully submitted,

/S/

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Timely filed on October 30, 2017