This proposal is un-needed. The current Technician material is not a barrier when five and six year old children are passing the exam with ease. There are more amateur radio operators now than ever before. In addition, international telecommunications law specifies what is required to become a licensed amateur radio operator.

There is no exam required to become licensed in the General Mobile Radio Service (GMRS). The “exam” consists of filling out the form, promising to follow the rules and paying the license fee. Since there is no formal exam other than an amateur radio licensee proctoring the applicant filling out the form, the petition discusses mentoring as a way to educate the new Tyro licensee. There is no guarantee mentoring will take place once one becomes a Tyro licensee. Given the non-existent exam, this will become the majority of licensees just as the Technician class has become.

I am the trustee for 11 amateur radio repeaters in the Washington, DC area. I participate with the regional amateur radio repeater coordinator, and have never heard of the TyroSubBand. The petition makes this sound like those repeater pairs are already available. Band plans for the 70 cm band do not have any FM repeater allocations below 440 MHz. Much of the 70 cm spectrum between 420 and 440 MHz is allocated to CW, SSB, weak signal, satellite, and ATV.

Also, the 70 cm amateur radio band is shared with the Department of Defense. We are not the primary user on 70 cm. It is a good arrangement. However, there are parts of the US where the DOD is using the spectrum and it is unavailable to the Amateur Service. The buildout discussed in the petition may jeopardize that good relationship.

The petitioner mentions the need to use amateur radio to solve CERT communications problems. CERT has other radio services at its disposal that do not require a license. This petition appears to be attempting to create an amateur radio license for CERT members and using amateur radio spectrum for their near-exclusive use.

I have been an amateur radio instructor for over 35 years and the vast majority of CERT members obtaining amateur radio licenses recently have no real interest in amateur radio. Plain and simple. They only view it as a tool of the trade for CERT activities. They get a Technician license in a weekend crash course or study on their own, buy an inexpensive radio from a vendor on the Internet and the radio sits unused except for occasional CERT activities. There is no interaction with other amateurs outside of CERT except at the exam session. They do not upgrade their license because there is no interest in amateur radio beyond CERT.

Another class of amateur radio license with minimal requirements that appeals to one group of operators is not prudent. Emergency communications is part of the reason we exist, but it is not the only reason. This petition does not address any other principles.

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