

16 March 2019

Gentlemen:

I am opposed to the proposal to add a Tyro license class and restructure the 70 cm amateur band. As an Extra class amateur, educator, and volunteer examiner, I believe that the assumptions of the proposal are flawed and that its implementation would not benefit Amateur Radio as planned:

1. Augmentation of CERT capabilities is not a sufficient reason for adding a license class - and other services such as GMRS are already available that can provide limited area FM communication.

2. Adding a license class is exactly the opposite direction taken by the FCC over the last two decades, where the aim has been to streamline the Amateur Radio service. The proposal fails to discuss how the increased costs of implementing the various structures required for the Tyro service will be covered.

3. Implementing a license class that requires no technical knowledge of radio does not support the purpose of Amateur Radio as outlined in CFR47.97.1, "Basis and Purpose"

4. Asking Technician class licensees to be test proctors and/or mentors is not in alignment with the current volunteer examination system structure.

a) Currently volunteer examiners must be General class or higher and at least of 18 years of age. No such restriction is in place for Technician class licensees.

b) The proposal would require restructuring the Technician class licensee qualifications and question pools, which are already quite full with the basic knowledge needed by new licensees.

c) The use of an online testing system can dilute accountability and open the door to exam fraud if it's not properly administered. The additional costs and responsibilities associated with such a system are not discussed in the proposal.

d) While many Technician class licensees are well-qualified to act as mentors in radio, not all may be. While the same argument can be made for all amateur license classes, however, it is more likely that a greater fraction of General and Extra class licensees will possess the additional knowledge and skills needed to serve in this capacity.

5. Implementing arbitrary technical standards weakens the Amateur Service.

a) Channelization of a portion of the 70 cm band limits other uses of the spectrum.

b) Imposing 2.5 kHz "narrowband" FM as the only acceptable modulation means that the radio configurations for this portion of the service are incompatible with present amateur practice. While moving to a narrowbanded FM model is a noble goal, standards should remain consistent across a service as much as is feasible.

c) The Tyro service frequencies are segregated from conventional practice by frequency and by repeater frequency split (the proposal specifies 9 MHz T-R frequency splits, as opposed to 5 MHz as the standard practice used in the amateur 70 cm band).

d) Some of the technical standards proposed are either obsolete, redundant, or could lead to unintentional interference. For example 4.58 - minimal modulating frequency - is obsolete given the frequency stability of current amateur equipment. 4.29 - "OpenAccessCodes" - appears to limit the Tyro system to only three CTCSS tones, which seems to weaken CTCSS's capacity to reduce interference.

e) No mention is made of the cost of building and maintaining an infrastructure of repeaters and other equipment that are dedicated to the Tyro operators.

f) Segregating Tyro operators from amateur operations using existing frequencies and modes reduces opportunities for mainstreaming and learning, critical for developing both social and technical skills necessary for growth in Amateur Radio.

v/R

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