

**In the Matter of** )  
 )  
**Amendment of Part 97 of the Commission's Rules** )  
**Governing the Amateur Radio Service Rules** ) **RM-11828**  
**Concerning Permitted Emissions and Operating** )  
**Privileged for Technician Class Licensees** )

**TO:** The Chief, Wireless Telecommunications Bureau, Federal Communications Commission

**SUBJECT:** Comments on RM-11828

The commentator, K3URT, is an Extra Class licensee with nearly 25 years of operating experience, a Volunteer Examiner (VEC) for license testing, and a member of the ARRL.

**ALLEGED PREMISE:** “It will attract newcomers to Amateur Radio...” [page 1]

1. **RESPONSE:** Unsupported claim. The problem with adding and retaining entry-level licensees is demographic and cultural/economic. The amateur radio community continually looks to “young” new individuals to populate its ranks, but the demographics show it is generally the over 60 years of age cohort who become first licensed.<sup>1</sup> The lack of interest and growth with the 40 years of age and under cohort is demographic and economic and nothing to do license barriers to “getting on HF.” From my own conversations with Technician Class licensees and potential inductees into this great hobby, the reasons for not upgrading or joining the ranks are: a) housing restrictions prohibiting *ideal* operations; b) works 2-3 jobs<sup>2</sup> and thus having no time for it during their prime work years; c) the prohibitive cost of equipment; d) Internet voice protocols making DX and local communications more reliable. Internet Protocol systems have also disincentivized entry-level amateurs with online communications — they see no need for HF when they can talk to someone over the Internet.

Most subjects are not in an elite career field that allows them to work a singular “regular job” with regular hours, have a “regular house,” or a “regular income.” Conversely to “I’m retired now and have no family to raise,” etc. However, despite an unfavorable socio-economic environment for the past decade the decline of US amateur radio licenses cannot be found. Licensed operators in the US, the bulk Technician Class, are at an all time high.<sup>3</sup>

**ALLEGED PREMISE:** “...it will result in increased retention of licensees who hold Technician Class licenses...” Allegedly there is not enough incentive in the Technician Class to operate as an amateur radio operator; that current restrictions prohibit an incentive to upgrade. [page 1]

2. **RESPONSE:** Another unsupported claim. Amateurs have upgraded to higher license classes for decades. There is no evidence that the current license structure prohibits anyone from upgrading who has not applied themselves to study. Based on the ARRL argument, why not collapse all license classes into one? Or abandon testing altogether? Or abandon any incentive licensing at all? ... in order to obtain the desired end result? In-

---

<sup>1</sup> § 8, page 7 graphic demonstrates the correlation of “baby boom” decline and licensing from the 1990s and the struggle with amateur radio to keep up in later years. (Also see Frey footnote 5, this commentator’s narrative.)

<sup>2</sup> Desilver, Drew. “For most U.S. workers, real wages have barely budged in decades.” <http://www.pewresearch.org/fact-tank/2018/08/07/for-most-us-workers-real-wages-have-barely-budged-for-decades/>

<sup>3</sup> “Total US Amateur Radio Licenses through end of Dec. 2018.” <http://www.clearskyinstitute.com/ham/stats/index.html>. See also <http://www.arrl.org/fcc-license-counts>

deed, as a VE, I witness many applicants who memorize the test and *do not understand the content of the material they are applying for!*

ALLEGED PREMISE: “...Amateur Radio exists among many more modes of communication than it did half a century ago...” and Amateur Radio must compete with them. [§5, page 5]

3. RESPONSE: Indeed, Amateur Radio already offers many modes of communication it didn't have even a decade ago. Current entrants already have a bouquet of options in Amateur Radio — from CW to Moon-bounce — already available in the Technician license class with many on the HF bands. “Twenty-seven small frequency bands throughout the spectrum are allocated to this service internationally. Some 1,300 digital, analog, pulse, and spread-spectrum emission types may be transmitted.”<sup>4</sup>

ALLEGED PREMISE: Obstacle to growth and goals for those under 30 years of age are limited. Many Technicians do not participate actively or pursue higher license classes. [§6, Page 5]

4. RESPONSE: Demographically, the under 40 age cohorts are becoming numerically less. Past Amateur Radio growth was based upon the “baby boom” generation and amateur radio grew with it.<sup>5</sup> Subsequently, the aged 60+ cohort is aging out of the Amateur Service at the same time, creating a dilemma the amateur radio community sees as a dire threat. The solution is not to entice new entrants with the HF lure — past experience just does not factually support that. My personal interaction with the 40 age and under cohorts are that they barely understand what AM/FM broadcast radio is, let alone the bare technicalities of radio science and operating a radio station communicating with someone thousands of miles away. This is not meant to be a pejorative observation. The goal is to educate and further perpetuate radio science, but proposing irresponsible incentives is not a real incentive. The privileges currently in place by the FCC are adequate.

ALLEGED PREMISE: “... in order for a newcomer to have an incentive to upgrade his or her license class, he or she must have had a positive experience while holding an entry level license.” [§9, Page 9]

5. RESPONSE: Very true, but those who have already upgraded to higher classes also had the same experiences. Experience, like anything else in life, is largely up to the recipient's adventure, education and perception. The solution for retention and advancement is up to the individual. Indeed, obtaining HF privileges does not guarantee a positive experience in amateur radio in any license class or circumstance.

ALLEGED PREMISE: “The issue is whether or not the entry level license offers newcomers a sufficient incentive to obtain an Amateur license in the first place; and once that entry level license is obtained, whether it provides enough exposure to various facets of the avocation that the newcomer is integrated into the avocation and has an incentive to proceed further to the General, and then the Amateur Extra Class license.” [§19, Page 17]

6. RESPONSE: See my response #1 above. But also, amateur radio culture has changed to one that has become less in “Elmering” than in the past. The amateur radio culture has been spun toward emergency operations rather than experimenting and *learning* the radio sciences. Culture in the United States has lessened in emphasis on science and facts. Technician Class licensees do have HF exposure if they want to take it and use it with current privileges with activity with clubs, Field Day, etc.

---

<sup>4</sup> <https://www.fcc.gov/wireless/bureau-divisions/mobility-division/amateur-radio-service> Rule Part 47 C.F.R., Part 97.

<sup>5</sup> Frey, William H. “US population growth hits 80-year low, capping off a year of demographic stagnation,” December 21, 2018. <https://www.brookings.edu/blog/the-avenue/2018/12/21/us-population-growth-hits-80-year-low-capping-off-a-year-of-demographic-stagnation/>

ALLEGED PREMISE: “The potential ‘customer’ needs to see enough value in it to take a closer look, ask questions, and decide whether to engage or not. *Prospective radio Amateurs may have little idea what opportunities are available*; [italics mine] how much work it will take to become licensed or to be active on the air.” [§21, Page 18]

7. RESPONSE: Shame on the ARRL for this totally false statement. “...may have little ... opportunities...” Baloney! Or is this an admittance of failure by the ARRL in exposing and educating its target audience? The Internet is full of information for even the bare savvy individual.

ALLEGED PREMISE: The entry-level license class retards the growth of the Amateur Radio because it relegates the operator to “FM repeater communications.” [§13, Page 13]

8. RESPONSE: As noted previously there are many other facets of Amateur Radio other than repeater communications. Indeed, my personal interaction with some Technician Class licensees is that they are simply satisfied with the privileges of that class — many entered because of the increased popularity of emergency communications on a local level, and have stayed at that level purposely. Those who went on to a higher license class did so not because of examination barriers or lack of incentives, but because they “caught the bug” and wanted to do more, by peer pressure, or were interested in HF emergency operations. Furthermore, giving expanded telephony or digital privileges as proposed by the ARRL will only have the opposite effect: there will be no incentive to upgrade to the next higher class because they already will have sufficient HF privileges to meet their needs. The result will be another cycle of alleged stagnation.

FURTHERMORE, currently licensed Technician Class amateurs are not qualified nor have tested for the proposed new HF privileges and modes per the Technician Question Pool. Based upon this fact alone warrants dismissal of RM-11828 immediately.

As a member of the ARRL, I have to **firmly disagree** with the ARRL leadership and their support of RM-11828.

With highest regards to the amateur radio community and service, humbly submitted:

/s/ Curt Sanders, K3URT