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## **RM-11829 Comments**

### **Good Things**

#### **On-line Testing**

The more I think about this proposal, the more I like the idea of on-line testing, not just for the proposed Tyro Class of license but for all licenses. The immediate concern is test security, but I really don't think that's a problem. On-line tests are given every day and I'm sure that with appropriate thought, the Commission can come up with a good system. Proctoring of exams is no guarantee that the tests and the answers will be correctly administered. Recent news stories about parents arranging for their children's answers to be corrected on college admissions test show that proctoring is no assurance that the test is secure<sup>1</sup>. Indeed, college admissions tests pride themselves on their security.

The Commission should remember that the questions and answers for all Amateur Radio tests are freely available. I understand that there are websites that allow a prospective licensee to take sample tests. After a suitable number of sample tests, passing a license exam is easy.

Having on-line exams would simplify the entire licensing process. The job of the Volunteer Examiner Coordinators would be reduced to developing the exams. Grading the exams, of course, would be automatic as would issuing the licenses.

Now, I know the Commission is not going to adopt a proposal to change *all* Amateur Radio license exams to on-line tests; there will be infinite opposition to this. But the Commission should seriously consider it. If the Commission is willing to even *consider* a Tyro Class license that will have an on-line test, there is no reason to have *any* proctored Amateur Radio license exams.

### **Bad Things**

#### **Tyro Ghetto**

I don't support a proposal that by its own terms would keep the new operators on a select set of frequencies that no one else uses. Without any contact with more experienced radio operators—occasional contact with a mentor is not going to help—the new operators would have little incentive to move to a higher class of license. The new operators would effectively be ostracized to their tyro ghetto, not just by the frequencies that they are limited to, because they have taken the license exam on-line.

#### **Amateur Radio Operator Numbers**

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<sup>1</sup> <https://www.theguardian.com/us-news/2019/mar/12/us-college-admissions-fraud-scheme-charges-georgetown-southern-california-universities>

Not that I believe that increasing the number of Amateur Radio operators is a bad thing, but I believe it is a poor excuse for adopting a new license class. As I have said in previous fillings<sup>2</sup>, amateur radio is not a hobby “like tennis or philately.”<sup>3</sup> It is an unusual hobby in that it not only requires a license exam, but it requires interest, study, and work. Indeed, Wayne Green, W2NSD/1 (SK) said in one of his many editorials in *73 Magazine* that you couldn’t interest people in amateur radio if you stood on the street corner and handed out licenses. Wayne Green was right about many things and I believe he was right about this. Amateur radio is unusual; giving away licenses is not going to increase the numbers.

Of course, one must ask why we need to drastically increase the number of amateur radio operators. We dropped the Morse code requirement and that increased the numbers, but the increase has almost leveled off. How much will creating a tyro ghetto increase the numbers, will the new operators move to higher classes of licenses, or will we be creating a new radio service called the “Tyro (Ghetto) Radio Service?”

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<sup>2</sup> I believe it was in the proposal to drop the Morse code requirement.

<sup>3</sup> Lehrer, Tom; “Smut”, *That Was The Year That Was*, 1965.