# Public Comment in re to RM-11828

Submitted March 21, 2019

I am opposed to RM-11828 on the grounds that it appears to mainly serve only the pecuniary interests of the ARRL without regard for the additional burden that will be placed upon the Enforcement Bureau and the potential problems and congestion it will cause to the higher class licensees already occupying these very crowded frequencies.

Recently I read some information about granting voice privileges to Technician Class HAM's which prompted me to find the docket presented to the FCC.  After skimming the 30-page docket and re-reading some of the more pertinent sections it appears to me to be another push for membership in the ARRL and selling magazine subscriptions and related League paraphernalia.

I have to ask, how is granting voice privileges on already crowded portions of the HF bands to Technician Class Licensees going to further motivate them to gain higher classes of license?  How will it help to advance the "ART" of Amateur Radio?  Where is the pride of accomplishment if you just "give away" the privileges that virtually every current HAM had to study and work very hard to achieve (earn)?

I hate to say this, but it sounds like the same program of many public schools these days that reward students with passing grades and ultimate graduation, just for showing up for class, regardless of any effort or accomplishments.

The FCC, by their own (and frequent) admission already has a plate overflowing just administering the commercial services. The last thing they need is another administrative liability.

With the actual verbatim license exam questions **and answers** already publicly posted on the Internet, there is absolutely **no excuse** whatsoever for current “Technicians” not spending a little time to read over and memorize the General (or Extra) class exam and at least metaphorically making some minimal effort to **earn** their General Class ticket. The only thing stopping them is motivation. Will Amateur Radio as a hobby benefit from further prostitution of the entry requirements by simply handing out additional unearned operating privileges? If so, in what way? Specifically who besides the ARRL stands to realize the greatest benefit?

We also know that a fair number of “new” Technician class licensees were initially spawned out of the “prepper” groups from within the conspiracy theorists who predict an imminent doomsday, Armageddon, or to use their vernacular, a “SHTF” day. But by and large we find that **these** people actually tend to stay to themselves, seldom ever speaking to each other openly over the air, as in their twisted belief to do so might reveal their own level of readiness and stockpiles of survival resources.

Many within this “prepper” group got their Technician license initially because they were told that they needed it, which although legally true, they’ve since come to realize was a lie. License renewals (among preppers) are dropping-off partly out of a newly realized fear of being publicly listed in a Federal database by the very government they’ve come to fear the most. Preppers have also been told (correctly) that they in fact face far less potential legal trouble from being unlicensed and simply bootlegging on any frequency they choose, whenever they choose. CB all over again, except on the HF bands.

I would also like to ask how the FCC plans to enforce the 200 watt power limitation? There are only a tiny number of true 200-watt HF transceivers and every one of those are in fact quite expensive, even used. Are we to naïvely believe that the “Technicians” will purchase kilowatt amplifiers and then be content operating them at only 200 watts? How many of those amplifiers operate efficiently and cleanly at only 20% of their rated output?

Please rethink this.

Respectfully,

William D. Garfield