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Rule Making Number: RM-11829

Date: March 22, 2019

Subject: Comments regarding NPR RM-11829 as proposed by Gary A. Hampton

The PFR submitted my Mr. Hampton must be dismissed by the FCC. As an FCC licensee in the Amateur Radio Service (ARS) for 45 years, I do not recall ever reading such a rambling, philosophical, convoluted, error-filled, assuming, and inefficient collection of red-herring information. Therefore, I request that Mr. Hampton's proposals contained within RM-11829 should be denied and summarily dismissed by the Commission.

There will be no scientific research, especially anything of a beneficial nature, that could possibly come from these proposals. Public service communications will not be enhanced since various modes and diverse equipment is necessary to facilitate various emergency communications scenarios. A channelized, low-power UHF transceiver operated by a technical neophyte during an emergency would be ineffective and not representative of the true capabilities of the ARS and a trained EMCOMM amateur radio operator. Frankly, I see absolutely nothing positive for the ARS contained within this proposal.

Current Technician class license holders, individuals that were required to pass a slightly more difficult exam element than that found in Mr. Hampton's proposal, seldom if ever exercise their current vhf and uhf privileges. Most of the silence on vhf and uhf repeaters is due to the technician's deep void of technical knowledge which in-turn creates a fear of communicating with another ham, especially one that might ask questions the technician cannot answer. This lack of knowledge is promulgated by today's ham radio testing methodology of "memorize, pass test, learn nothing". Most repeaters monitored today are usually silent and grossly underutilized. Further, today's technician operators in large part continue to show no real desire to improve or upgrade their license, thus 50% drop out of the ARS. Given these observations, there is absolutely no justification or need for creating another sub-class of Amateur Radio License that requires even less technical skill and respect for the RF spectrum than that required of the current Technician license holders.

This class of license would present yet another impossible regulatory burden for the FCC. With limited funding and limited compliance personnel, this type of wild-west radio license would quickly morph into nothing more than a UHF CB band, essentially useless for public service, useless for research, and useless for learning.

Additional reasoning for denial and dismissal by the FCC of this proposal stems from the fact that, if such a license class were created, more and more non-FCC compliant foreign radios would certainly find their way into the country. These ultra-cheap radios have been proven to create spurious interference to

other vital services adjacent and/or harmonically related to the band channels requested. Many of these units are already in the US today and bear a counterfeited FCC acceptance certification. There are already tens of thousands of Chinese non-FCC approved radios in the US largely due to the advent of ham-use of the commercial service mode DMR, another mode that requires no thinking, just button pushing. As previously stated, many of these radios have been proven to have dirty transmitters and the manufacturers seem to have no incentive to comply with FCC compliance criteria. The demand for this kind of cheap, rf-dirty radio cannot and should not be supported, stimulated, or incited by creating the new license class as proposed in Mr. Hampton's PFR.

The ARS does not need more quantity. What is needed is more quality young people coming into the ARS that have a real desire to learn and that are more fascinated with RF communications and it's many facets than mindlessly staring at a smartphone. The overarching fact remains that the ARS needs more quality. Mr. Hampton's proposal does not clear this hurdle and should be dismissed.

Unfortunately, it seems the only individuals and entities that seem to prefer quantity over quality are those that stand to profit financially. Some of these entities include vendors of study guides, amateur radio antennas and gear, and national associations. If an entity can profit from more ham-related licensees, then that entity may support anything to increase head-count regardless of merit, the long-term damaging effects on the Amateur Radio Service, or the ability of amateurs to provide proper and consistent public service.

This concludes my comments regarding RM-11829.

Thank you for your time and consideration.