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Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Room TW-B204
Washington, DC 20554

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Re: Docket RM-11829, Comments regarding NPRM RM-11829

While I support many of the statements made by Mr. Hampton and appreciate some of the ideas he has put forth, I do not support this NPRM as written. I would support the idea of bringing back the Novice class license to the Amateur Radio Service and renaming it Tyro class. I support the idea that a short on-line or written test proctored by a licensed Amateur Radio operator of Technician class or greater who wishes to serve as the Tyro class operator's mentor would be sufficient to issue a CSCE for the Tyro class element, and allow the FCC to issue the holder a valid Tyro Class license. I support the idea that Tyro class licenses be allocated limited additional privileges in the 70cm band, but would suggest that a limit on ERP be set to reduce the likelihood of interference with shared use of the 70cm band. I do not think it necessary to impose an age restriction on any Amateur Radio Service license class.

Mr. Hampton fails to recognize in his proposal that portions of the 70cm band are secondary to US Military and Government users that have active installations for Radiolocation, such as the Millstone Research Radar in Westford, MA. It is not likely that the FCC will support a change in Part 97 that forces active government and military installations to vacate spectrum. The channelization proposed by Mr. Hampton does not take into account spectrum that New England amateurs avoid using to minimize interference to the Millstone facility. Flexibility in operating is a significant part of Amateur Radio. I do not think that it is necessary to channelize spectrum allocated to Tyro class license holders. Users looking for channelized radio services should consider PRS Bands, and Tyro class operators would benefit from access to the large deployment of 70cm repeaters already in service. Additional repeater channels with a wide split and taking into consideration his suggested standardization for CTCSS tones could be created by existing spectrum management organizations that take into account local band utilization. While Mr. Hampton's solution is elegant in its simplicity, it lacks the nuance required to address the situation as it exists and creates a new market for specialized radios that need not exist.

To address Mr. Hampton's concerns around interoperability and EmComm, perhaps the FCC should consider a rule change that allows CERT/ARES teams to obtain a GMRS license to cover their members for use during EmComm drills, exercises, and deployments. Alternatively, the FCC could grant amateur radio operators (including Tyro class operators) privileges on GMRS. This would provide an ideal space for interoperability between services. Relationships continue to be developed between CERT/ARES organizations and served agencies, and interoperability would benefit from shared access to spectrum for users licensed by rule (FRS), licensed by examination (ARS), and licensed by rule with a fee (GMRS).

Respectfully,

/s/ Jeremy S. Taylor, K1JST/AG