

Comments regarding NPRM RM - 11829

I oppose the creation of the "Tyro" license class as described in the proposal.

First, the amateur radio service requires technical knowledge of its participants. The Technician exam is sufficiently substantial to minimally meet this requirement. Lowering the bar further would reduce the level of technical knowledge in the amateur radio service. This would be bad for the amateur radio service because the technical understanding is a fundamental component of being a ham. And, in emergency communication situations, it's especially important for the technical knowledge to be present as communications systems have to be configured in a hurry in unanticipated circumstances!

Though I'm sure some Tyro licensees would take interest in facets of amateur radio available to them at a higher license class, many of the Tyro licensees would not use the license as a step towards developing further knowledge but merely as a way to legally participate in communications on the 70 cm band with other amateur radio operators. The apparent purpose here is to enable more people who don't have technical interest or aptitude to participate in emergency preparedness. I support this purpose, but not the proposed means to achieve it.

The proposal contains many words about mentoring which is an important part of the amateur radio service, but nothing to actually require or encourage it. The scheme really seems to be configured to increase the number of hams, and enable non-technical people to participate in emergency communication organizations that primary use amateur radio.

There are alternative ways for people interested in emergency communication participation but lacking time or interest in the technical aspects of radio to be a part of the solution. The first is GMRS, which is quite suitable for local emergency communications. If a particular emergency communication organization requires interoperability between the amateur radio operators and the members who do not wish to learn the material for the Technician test, that organization can help its amateur members obtain GMRS licenses and radios. Better yet, the FCC could grant amateur radio operators permission to use GMRS frequencies using radios they already have that meet part 97 requirements and limit transmit power, but are not type-accepted for GMRS. The second is CB radio. It does not require a license application at all, and works well for local communication. It works better than GMRS in rough terrain. It permits its users to design and make their own antennas, which can help set up emergency communication channels to suit the organization using it. Again, emergency communications organizations can help its amateur members obtain CB radios so that the two subsets of users can communicate easily with each other.

Other effects of introducing the Tyro category of license may include:

1. Increased number of hams, a significant number of which would probably join ARRL so that their club can maintain the benefits of being an ARRL-affiliated club. ARRL gets more revenue.

2. Increased sale of 440 MHz radios. This doesn't do much good here in USA as the cheapest radios are generally imported via unregulated methods and are thus unlikely to comply with FCC requirements for clean emissions.
3. Increased use of amateur radio frequencies for control of unmanned aerial vehicles, also known as drones. This doesn't contribute to the amateur radio service.

Please do not implement the Tyro proposal.

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