

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)
)
AMENDMENT OF PART 97 FOR TECHNICIAN)
OPERATING PRIVILEGES)
) **RM-11828**

TO: The Chief, Wireless Telecommunications Bureau

Since undoubtedly you have received numerous responses I will make some brief and to the point comments:

- A.** The ARRL mentioned in their petition (Par. 23, Page 19) that two surveys were conducted, the first from “self-selected” individuals with the second survey being one of 1,000 randomly chosen individuals. I surmise this second survey was done because the first survey did not agree with an internal *a priori* bias within the ARRL, and did not give the answers the ARRL sought.

- B.** Incentive licensing is usually taken to mean that because of the individual’s personal motivation, the licensee will seek to gain knowledge and experience in order seek a higher class license with more operating privileges. This petition actually “de-incentivizes” the stated goal of Incentive Licensing by not encouraging more study and testing, but rather giving free and unearned privileges to the licensee.

- C.** The question remains, and was never answered in the petition, as to why emission A3E (Amplitude Modulation Double-Sideband) was excepted as one of the emission modes allowed for the proposed modified Technician privileges, pp. 28-30. Reading through the petition, there is more weight given to RTTY and Data than any other emission mode. This patently shows another bias from within the ARRL without any supporting evidence as to why more weight should be given to certain emission types than others.

Summary:

I would encourage the Commission to reject this petition as it has no merit in terms of the goals of Incentive Licensing and its questionable bias against certain emission types.

Kindest Regards,

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