

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

In the Matter of:)	
)	
The Amendment of Part 97 of the)	
Commission's Amateur Radio)	
Service Rules Concerning Permitted)	
Emissions and Operating Privileges)	<u>RM-11828</u>
for Technician Class Licensees)	
)	
)	
To: The Chief, Wireless)	
Telecommunications Bureau)	
)	
)	

OPPOSITION COMMENTS

I am pleased to offer my Opposition Comments in the above captioned proceeding.

1. Background

My primary objection to the filing of the instant Petition is that it lacks the proper character of what has incentivized hundreds of thousands of licensees since the 1960's (including me) to obtain higher classes of amateur licenses. *Enhancing the privileges of an entry-level license serves to diminish, not enhance the incentive* for those already licensed to strive to achieve a higher class license and enjoy greater privileges.

In the 1960's, ARRL and the Commission restructured Amateur Service privileges and called it *Incentive Licensing*.¹ Spectrum, mode and power level privileges were *taken away from General/Conditional and Advanced classes and awarded to Extra Class licensees* so as to establish a "graded approach." The intent was to encourage licensees to learn additional theory and Morse code operational skill to further develop technical knowledge and operating prowess. Clearly, sound incentives were created to upgrade to a higher license class that have served not only the Amateur Service, but our nation as well in encouraging pursuit of technical education. It worked for me and for thousands more.

¹ Developed in 1964, implemented in 1968.

This successful concept has been around for more than 50 years. And now, this proposal to award High Frequency (HF) digital privileges to entry class licensees will help destroy a progressive concept that has worked well for decades.

2. Amateur Beginnings

I have been a licensed Amateur since December, 1961. And, I obtained an FCC First Class Radiotelephone license in 1964. In the following paragraphs I will try to explain what it was that encouraged me to obtain both, and pursue a later education and career as an engineer.

My beginnings were as a shortwave listener in the 1950's. Listening to first the Voice of America since I resided near one of its stations; and then other foreign broadcasts. It was being able to simply tune an old, cast-off radio to something different than local news and music that piqued my interest. I soon discovered and began listening to amateur radio operator conversations from all over the globe, and served to really instill my interest in becoming an amateur radio operator. Since there is little left of shortwave broadcast today, together with Homeowner Association Antenna Restrictions, not a lot of HF monitoring opportunity anymore. Instead, today's young listeners usually begin with VHF/UHF scanner radios and hear only local communicators, perhaps some maritime and aircraft traffic and National Weather Service broadcasts.

I would argue that the incentive today to obtain Technician licenses is in large part driven by membership in 'CERT,' or Community Emergency Response Teams.² In my thinking, almost all of today's Technician licensees seek the ability to communicate over a short range post-disaster. And, their first and usually only radio is a small VHF/UHF handheld.

This Petition, if adopted, would do little, if anything at all to incent those CERT-inspired licensees with a limited interest in the other aspects of amateur radio.

3. Meant to Be Conversational, Not a Conduit

Amateur radio was created as a means for two or more amateur operators to contact each other in conversation. While it is true that there are many conversational digital codes in current use, it is my belief that this Petition is not about traditional amateur conduct, but instead to facilitate more third party and "bulk" message traffic, including emails. Content that is being sent and received from the Internet via radio via Automatically Controlled Digital Stations (ACDS) that function as store and forward, or forward in real time digital repeaters.

It is my belief that beneath the surface of ARRL's stated interest in expansion of the number of licensees is an interest in *flooding the HF spectrum* with digital email traffic. From those who are boaters, campers and RV owners who seek an almost no-cost way to send and receive emails.

² The Community Emergency Response Team (CERT) program educates volunteers about disaster preparedness for the hazards that may impact their area and trains them in basic disaster response skills, such as fire safety, light search and rescue, team organization, and disaster medical operations.

Primarily through what is known as the ARSFI/Winlnk (A/W) network of ACDS. I am opposed to such expansion for several reasons, not the least of which are the characteristics of such ACDS in that they start up without listening first, often expand bandwidth without warning (interfering with adjacent communications in progress), and are not able to be monitored in their entirety by objective observers. ACDS with bandwidth less than 500Hz are not confined to narrow spectrum segments on each band as are wider bandwidth codes. Adding digital privileges to entry-level licensees, who aren't usually all that experienced with HF characteristics could create havoc and make the HF amateur bands a *virtual sea of ACDS*, rendering other modes virtually unusable.

4. Some Modern Digital Modes Not Easily Monitored

Perhaps with the exception of Radio Teletype (RTTY), and some other novel keyboard codes, many modern digital codes are difficult, if not impossible for 3rd party listeners to monitor without a lot of peripheral equipment. Especially those used for sending stored or bulk file content. An expensive modem is often needed and even then, in the case of PacTORS (except PacTOR 1, a 1995 version) that are frequently used with the A/W system, they cannot be decoded legibly even with the proper equipment. That is, they cannot legibly decode what is received if not actually interlocked in an actual communication while in Answer Receipt Request or "ARQ" mode. The same is true for other ARQ codes used by A/W and others, even if not using PacTORS 2 or 3.³

5. ARRL Membership Enhancement Gimmickry

And, now for the real, underlying reason behind this instant, ill-conceived and specious Petition: To enhance ARRL membership. How so? Well, ARRL membership is now only just slightly more than 21% of licensed US amateurs (including myself in the 21%). Free, over-the-air email service via amateur radio while away from home! Perhaps we can even look forward to a full-page ARRL advertisement in Yachting Magazine. Never mind that such regular usage, to avoid for-fee commercial services, constitutes a violation of Part 97 rules.⁴ Just pass the entry-level amateur license and voila, that's all there is to it, beside the cost of equipment acquisition. (Maybe ARRL will consider contributing the A/W \$25 annual "donation" in addition to its QST subscription for newly licensed Technicians as part of their membership fee) And, of course, ARRL publishes and markets license exam study manuals and would serve to benefit from the throngs anxious for free email.

ARRL's membership problem won't be solved by such tactics. The non-member 79% probably don't belong (or did once and didn't renew) due to the League's storied history of not doing

³ Frequent users must be pleased with what amounts to effective encryption of their email and file content using the ARQ code feature. A violation of 47 CFR§ 97.113(a)4.

⁴ 47CFR §97.113(a)5. World-wide wireless Internet access is available from Hughes Net, Iridium and other satellite service providers.

what's right for the majority of amateurs. Many, like myself, who remain members do so in the interest of trying to convince ARRL leadership to change and to be responsive to the desires of the majority of amateurs. In fact, ARRL recently even *censured one of its Directors* for mentioning subject items from one of its headquarters meetings.⁵ Many resigned their League membership from just that malevolent act that was meant to punish one of its own for daring to feedback to membership, or solicit member input.

Actions such as this instant Petition, that would promote *willy-nilly* digital spectrum use to benefit a clique of digital relay activists; seriously damage, if not destroy altogether the principled *Incentive Licensing* that has served the Amateur Service well for more than 50 years; and make it sound as if it's all "for good of the Service" *when it clearly is not*. It is high time that the League poll its membership to determine *what US amateurs really want* for responsible digital spectrum utilization and stop trying to stuff rule changes that would serve to the detriment of the Amateur Service down our proverbial throats.

ARRL should withdraw this Petition from further consideration immediately; or the Commission should *Dismiss it with Prejudice* as the overwhelming majority of licensed amateurs commenting clearly desire.

Respectfully Submitted,

/s/

W. Lee McVey, PE Ret.
W6EM, PG-12-19879
3 Squires Glenn Lane
Leeds, AL 35094-4564
April 4, 2019

⁵ Censure of Southwestern Division Director Dick Norton, N6AA. See <http://www.arrl.org/news/arrl-board-of-directors-publicly-censures-southwestern-division-director>