

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

Received & Inspected

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FCC Mailroom

March 19, 2019

RE: RM-11828 Amendment of Part 97 of the Commission's Rules Governing the Amateur Radio Service Rules Concerning Permitted Emissions and Operating Privileges for Technician Class Licenses

I am against the change

The ARRL states in its proposal, that changes are "critical to developing improved operating capabilities, increasing emergency communications participation, improving technical self-training, and increasing growth overall in the Amateur Radio Service. It will attract more newcomers to Amateur Radio; it will result in increased retention of licensees who hold Technician Class licenses; and it will provide an improved incentive for entry-level licensees to increase technical self-training and pursue higher license class achievement and development of communications skills." The ARRL has no factual basis to make these statements. I will show that there is no need for this change.

Let's first look at their second statement. It will attract more newcomers to Amateur Radio; it will result in increased retention of licensees who hold Technician Class licenses, and it will provide an improved incentive for entry-level licensees to increase technical self-training and pursue higher license class achievement and development of communications skills. If you will look at the license statistics over the past years you will see a very healthy growth in both Tech and Gen class licenses, if there were defection there would be a loss in tech class licenses and no increase in General class licenses. This is not the case as seen in the two graphs below. You will see that the growth in technical class has a very high growth rate proving that they are already attracting new comers and the high growth rate of the general class means the Techs are already advancing in class. Therefore the ARRL statements have no statistical basis for change in current operating privileges.



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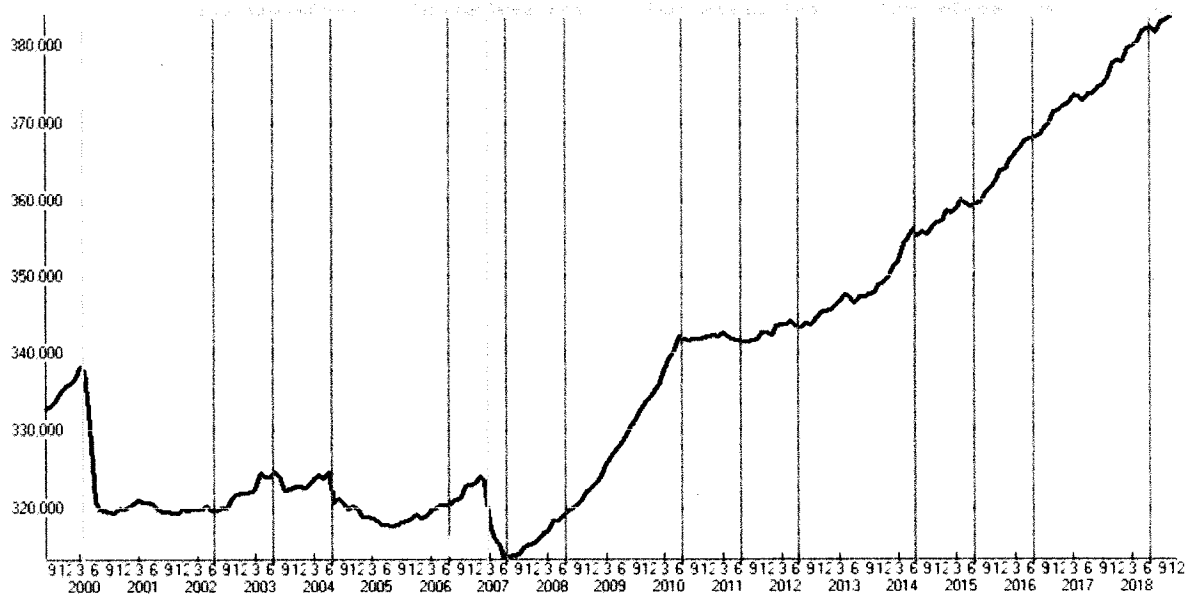
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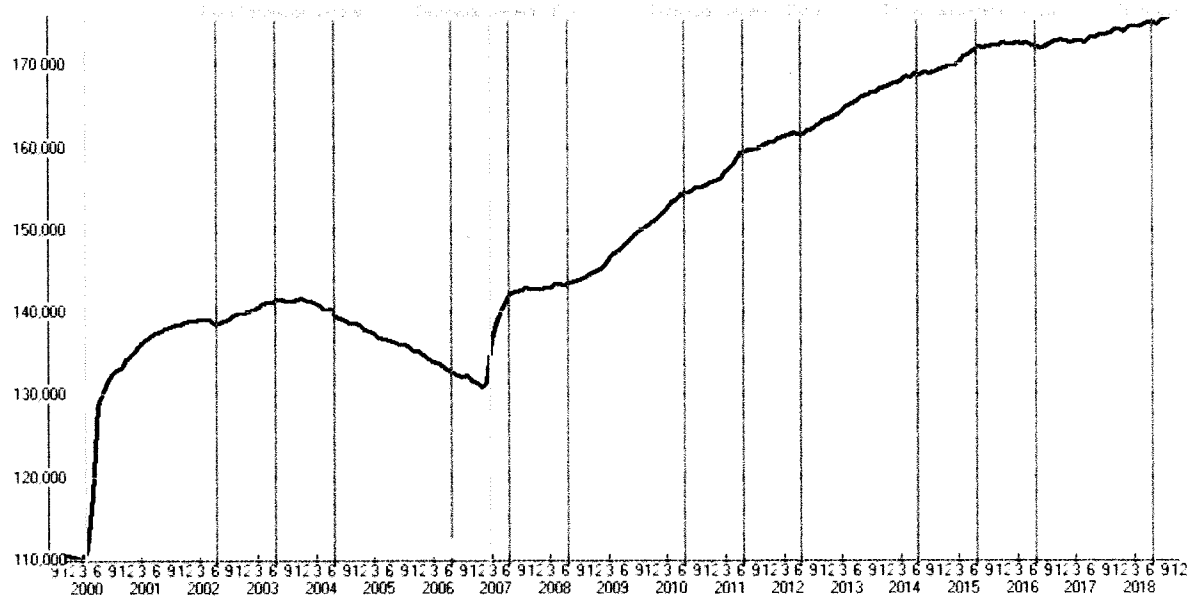
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US Technician Licensees



US General Licensees



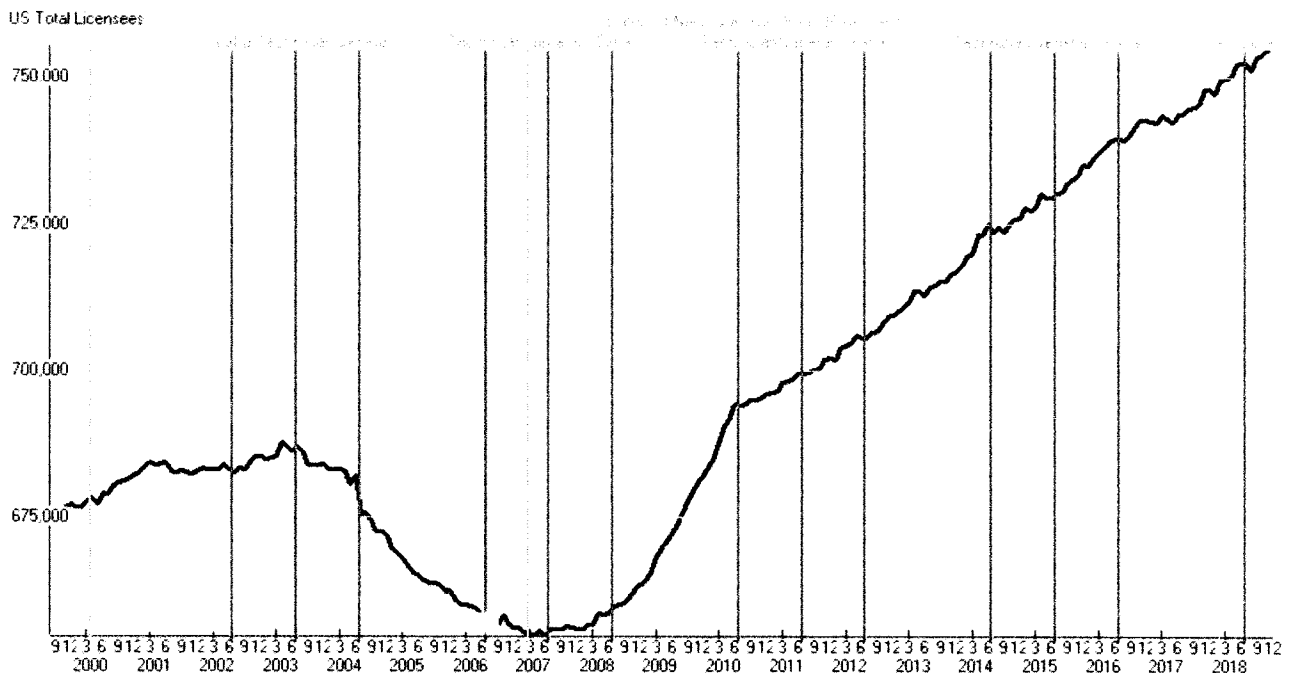
Next the ARRL states it is “critical to developing improved operating capabilities, increasing emergency communications participation, improving technical self-training. How does one develop improved operating capabilities by being given more frequencies in the HF bands? Of 15, 40 and 80. They have the same capability already in the vast 10 meter band where they can operate all modes. They also have all of the UHF and VHF frequencies to do the same. It has always been the case that the differences in the license classes is that one would learn operating skills, learn their equipment and advance as they gain the knowledge and experience. As they gain this knowledge and experience, they would advance in class and be granted new frequencies. ***This is the incentive!*** If the FCC allows them access to the 15, 40 and 80 meter

bands, what incentive do they have to advance? They will have most of the bands of the general and extra class license. Where is the incentive to advance?

Self training? Self training does not work. There are new hams that learn the answers to the tests and can take all three license class tests in one day. What have they learned except the answers to the test questions? I heard many Extra class licensees ask questions that a Tech should know. They are getting their license by self studying the answers to the test questions and are not learning anything, all via the internet. As a teacher of your children, would you want me to just give your children all the tests with the answers without any teaching? Well that is what is happening to FCC ham radio licensing. No teaching or learning, only memorizing the answers to the tests.

Increasing participation in the emergency communication cannot be done by increasing frequencies or by just increasing numbers in licensees. The ARRL even states that participation in ARES is already open to all class licensees. "The Amateur Radio Emergency Service, a program of the ARRL, offers to its partners at all levels, trained Amateur Radio Service licensees who are skilled in the use of a wide range of emergency and disaster communications techniques and who are committed to supporting our partners' missions in service to the public." There is no connection between giving more frequencies to Tech class licensees and their needed participation in ARES. The ARRL needs to communicate better with the 750,000 current licensees if it feels it needs more participants.

Finally the ARRL says this proposal is needed to increase the numbers of licensees. Really? Please look below:



Need I say more? The license numbers are up across the board. Just because ARRL is losing members, it does not relate to FCC ham radio licenses The ARRL has only about 160,000

members in the USA. Out of the greater 750,000 licensees, that is not a very good participation percentage. I believe that reason is that they do not reflect the majority of the ham radio community. "In 2016, ARRL had corporate attorneys provide a ~~director and officer code of conduct~~. This code was designed for a *for-profit corporate board*, and stressed **confidentiality**, just the wrong thing for a non-profit board that should be representing its members! The ARRL board majority, including every incumbent in this election, voted this code, officially called the *ARRL Policy on Board Governance and Conduct of Members of the Board of Directors and Vice Directors*, into the bylaws in January, 2017.

The code required that directors act to the membership as a *unanimous bloc* and prohibited dissent from board decisions in their public speech, even if they voted against those decisions. It even restricted directors from discussing the results of votes until ARRL officially announced them."* Actions like this do not give the Ham community a warm and fuzzy feeling. I did not renew my ARRL membership this year after being a long time member. Interesting is that I learned that they only communicate to their members but not the entire Ham community. They do not represent me. I feel they are failing to promote and provide ***the teaching and learning of*** theory, equipment operating skills, and science of radio communications in the licensing process. For the most part, I feel that most new hams know very little about amateur radio communications but a lot about the correct test questions and answers. Maybe the ARRL thinks the only way to increase their membership is to give more away and increase the ham population thereby growing themselves. Hams need to be taught radio communications and not allowed to get more than one higher license in a given year. This way they can practice and use their new found knowledge that gives them incentive to proceed to the next level. Once again the ARRL has not substantiated proof that there needs an expansion of frequencies for the tech class license.

Since the cutbacks with the FCC in enforcement, I also believe that many hams ***that did not*** have to work through the time tested reward for work method in achieving the higher class privileges, have decided there is no value in what they have, and are creating havoc on the frequencies. Interference, bad language, and operating out of band seem more prevent than ever. I have asked numerous times for the ARRL to work with the FCC to get some authority in getting the violators off the air or penalize them for their misconduct. The OO program did not work and I feel the new VM will not work.

I disagree with the need to expand the Technician license frequencies as proposed by the ARRL. They cannot support their claims based on license data. The current testing for licensing is also failing for there is no learning but only memorization of answers. The ARRL needs to address this and not more giveaways for unearned privileges.

The ARRL needs to embrace and offer all the help to local clubs where a person *has to attend classes* and receive training before he/ she or it is eligible to take a test for any and all class licenses. The ARRL already has much of what is needed and there are enough clubs to facilitate this. This is the only way people can really understand ham radio and how to operate with proper procedures.

. Giving everything away without earning it does not create a sense of value that one needs to protect, learn and enjoy Ham radio



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*<https://perens.com/static/ARRL/TransparencyOctober2018.html>