

As an Amateur Extra Class operator who has been licensed over 40 years, an amateur radio instructor for 30 years and a Volunteer Examiner for 25 years, I see absolutely no reason to create a "Tyro" class license. This proposal is nothing more than an attempt by a few Community Emergency Response Teams (CERT) to gain access to the amateur radio spectrum without following the proper licensing process.

Some of the positive comments make it very clear this proposal would be "great for their CERT group." One commenter pointed out that visiting CERT members told them ham radio is better than GMRS. Looking at online repeater directories, there are over 21,100 amateur repeaters in the US versus a little over 1400 GMRS repeaters in the US. No wonder CERT members want access to the amateur spectrum. FRS and MURS are strictly simplex with limited range.

As an amateur radio instructor and Volunteer Examiner, it is my observation that the average CERT member has absolutely no interest in amateur radio other than somebody telling them to get an amateur license for CERT. This is evidenced by the following:

1. They have no interaction with any of the local amateur radio community other than the exam because they have to in order to take the exam. They get the license and are never heard from again. I have yet to see one show up at a club meeting or hear them on one of the local radio club nets.
2. They buy the absolutely cheapest handheld radio they can buy (less than \$40), often an import that does not meet FCC standards.
3. They rarely get on the air, except for the occasional CERT drill or net, or the once in a great while bona fide emergency. The problem here is lack of practice means their skills are no better than when they first became licensed. In a real emergency, they will not know what they are doing and quickly become part of the problem. This has happened.
4. Most of these people will not take a regular licensing class, but are looking for the absolute quickest route to a license. Often, they are taught by a newly-licensed Technician Class license operator with practically no experience because they are the only licensed amateur in the CERT group. But, they will spend many hours taking CERT training. Again, lack of real commitment to Amateur Radio.

The argument that the current Technician exam is too complicated for some people to pass is not valid. As a Volunteer Examiner, I have seen many elementary age children pass the Technician and/or General exams with ease. The difference is these school age children have a real interest in becoming amateur radio operators

The basis and purpose of the Amateur Radio Service per CFR 47, part 97.1 is as follows:

(a) Recognition and enhancement of the value of the amateur service to the public as a voluntary noncommercial communication service, particularly with respect to providing emergency communications.

(b) Continuation and extension of the amateur's proven ability to contribute to the advancement of the radio art.

(c) Encouragement and improvement of the amateur service through rules which provide for advancing skills in both the communication and technical phases of the art.

(d) Expansion of the existing reservoir within the amateur radio service of trained operators, technicians, and electronics experts.

(e) Continuation and extension of the amateur's unique ability to enhance international goodwill.

Nowhere in the basis and principles of the Amateur Radio Service is there any reference to the Amateur Radio Service is there to provide an operator license class aimed at a specific activity, in this case, emergency communications. But, that is exactly what this proposal is attempting to do.

This proposal is heavily dependent on infrastructure, infrastructure that is susceptible to failure during a disaster, infrastructure that has not been built yet, infrastructure that will cost large amounts of money to construct. Where will the funding come from? The minute FEMA or any other organization becomes involved to provide grants to build this infrastructure, it is no longer an "Amateur Radio" system, but some commercial or government entity's system, with their rules. Once this type of license is allowed, other emergency and disaster relief organizations will see it as a way to get cheap communications for their organizations as well.

The concept of the online license "exam" is ripe for fraud because only one amateur is proctoring the exam. With 3 or more examiners, it is unlikely a fraud can be committed because it is too difficult to convince 2 or more examiners to go along with a fraud. A volunteer shows up at a disaster scene and is sat down at a computer to take an abbreviated training course followed by an online "exam," proctored by someone with an "entry-level" license. There is no accountability the Tyro licensee will receive any amount of training. An over-eager emergency manager who understands little about amateur radio will make sure as many Tyro licenses are cranked out for the duration of the disaster. It is highly doubtful that any of these people will have any real technical knowledge. These people are given a cheap import radio to use and turn back in at the end. They don't know how to use the radio, how to communicate using the radio, don't understand why it won't work in a tunnel, on the back side of a hill, etc. Amateur Radio Operators do understand these things because it was part of the training and exam. Most likely, the tyro licensee will never use the radio again because they don't own the radio they were using.

The layout of repeater channels uses and sub-audible tones is far too complicated for an "entry-level" license class. The only way to make this work is the radios must be sold pre-programmed with the proposed frequencies, access tones, offsets, etc. The

average “Tyro” operator with their very limited training will have no idea how to use the radio. This concept is contrary to the Amateur Radio Service, where amateurs routinely program their radios to suit their needs, not to conform to a standardized setup.

As one poster pointed out, this concept is an attempt to commercialize the Amateur Radio Service. There are other radio services better suited for this type of use than amateur radio. Please dismiss this proposal.

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