Comments to FCC RM 11828 (expansion of HF privileges to Entry class (Technician) Licenses.

Comes now a 64 year ham operator, a life member of the ARRL, who is opposed to the provisions of RM 11828.

GENERAL-

First off, this petitioner spends almost half its time knocking the FCC for its performance in administering the amateur radio regulations. This is completely hogwash and is not the point of the petition, which is for the expansion of Technician Class license HF privileges.

As a ham that has held, Novice, Technician, Technician plus, General, and now the Amateur Extra class licenses, and operated around most of the world, for 35 years service in the US Army, I can tell you that the structure and requirements were and are appropriate to the amateur service.

Second, the petitioner acknowledges the requirements in the increased privileges for each higher class of license, and the incentive for up grading of skill and knowledge to obtain a higher class license are indeed valid concepts. The petitioner’s speculation that present privileges are insufficient incentive for increased skill and knowledge is a contradiction of their own positions.

Thirdly, the petitioner represents only approximately 21.7 percent of the licensed amateur radio operators in the US and therefore is in no position to make general observations or comments about the desires of any class of licensee. In fact if the 8000 sampling was done that is only 1.1% of the amateur radio population. Also since the petitioner did not state the sample by license class, and since only a minority of the technician class pool constitute the ARRL members, then any statement made by the petitioner towards supporting the expansion of privileges for that license class is a misleading and not a supportable statement.

EMERGENCY COMMUNICATIONS

I started my ham radio experience as a novice licensee, and gained an appreciation for digital work, CW on the 80 and 40 meter bands. When I had to upgrade after my license expired I studied real hard and passed the written test. Shortly after that I was called to serve as net control station operator for the city of Fairfield CT during several of the 50’s hurricanes. These operations were conducted on 2 meter AM voice operations. Since that time I have not only conducted local but national, and world wide emergency/military communications, and I was not and am not in the electronics profession.

Now petitioner seems to infer that expansion of privileges for technicians would enhance their contribution to emergency communications. Nothing could be further from the truth. Upon passing the technician written test the holder has the basics of ham radio operations and the privileges by which to make a contribution to the service. Wild land fire communications use vhf and uhf frequencies for command and control. Very close to the 2 meter and 70 cm meter ham bands. Likewise for floods, mud slides and hurricane communication support. How about police, fire, and medical operations? Again vhf and uhf spectrum are used. Also with parades, jet boat races, and marathon running. Again its the same story. HF is of limited use for these events, and if so can easily be handled by general class and higher license classes. Is it not true that for every emergency/community event occurring, that it takes ten vhf/uhf operators to one HF operator to accomplish the mission? The more involvement a technician operator is in these situations the more he/she gains in skill and knowledge and provides our nation a pool of trained radio operators.

Having been in many later operations of this nature and meeting and talking with these young operators almost to a one say that that is what they joined for and what they want to do. Many will stay the same level, some will upgrade, and some as they get older will drop out. What is wrong with that?

STEM and EDUCATION

Wow, petitioner states that expanded privileges for the technician holder will enhance the STEM programs and Education. Well that is an unsupported statement and not related to the concept of the amateur radio service. First off of course education of the operator is increased by up grading and serving in the technician license privileges. Participation in emergency and community events, interacting with fellow license class holders, being exposed to operators of higher classes, and participating in ham radio clubs some of which are general in nature and some such as satellite communications, which techs can do.

As far as stem goes let us remember that stem is the institute of higher education’s program to get more students in training to be professional in the electronic industries. While some stem members may come from the amateur radio ranks, IT IS NOT THE GOAL FOR THE AMATEUR RADIO SERVICE TO BE A TRAINING GROUND FOR A PROFESSIONAL ELECTRONICS CAREER.

I have operated radio equipment from simple CW radios to multiple duplex military equipment all in the status as a volunteer amateur radio operator, and never as a professional electronics career person. I am a VEC and have spent many hours educating young people on the principals of wave propagation and antenna building along with instruction in vhf/uhf, and GOTA operation. Who do you think does the majority of this kind of education? IT’S NOT THE PROFESSIONAL; IT’S THE AMATEUR RADIO OPERATOR!

HF PRIVILEGES: Considerations, applicability, and effect upon The Amateur Radio Service

Considerations-

First, consider that techs have considerable CW privileges in the 80, 40 and 15 meter bands. These frequencies are key to traffic nets and of course general class licenses. Since CW can be an automated digital system, then techs already have one form of digital operations. But do they use that? Very few, because they are not interested in traffic, working dx, or ragchewing. So why would they be interested in use of other digital forms in these bands. Isn’t strange that the petitioner wants to subject these same frequencies to digital forms such as rtty, pactor and ft8-10? This is all in addition to unlimited privileges in the VHF and UHF segment of the spectrum.

Second, Petitioner wants voice privileges in the 80, 40, and 15 meter bands. Now the 3900-4000 frequencies are the primary space for state emergency operations bands. If indeed these agencies allow techs in their Emergency Operation Centers(EOC) any operations done would be under the supervision of a higher grade license.

Third, Petitioner wants voice privileges in the 7225-7300 frequency range. Just so happens that many inter-continental emergency nets, especially hurricane, land mobile nets, AM operations, and traffic net operate in this segment. Once again if a tech is involved in one of these emergency nets he/she would be supervised by a higher class license. Thus there is no need for them to have these privileges.

Fourth, although it is generally agree upon that the 15 meter higher band segment is seldom used, when that band is open, ie sunspots cycles with MUF, this segment is used for dx, and general rag chewing, with some nets operating in that segment. If the purpose of the tech, entry class of license, with its limited educational requirements, and skill, then this is not an appropriate place for their phone operations.

Applicability-

As stated above, if emergency operations experience is desired and such operations will be supervised by higher class licensees then there is no reason for technical class licenses to have these voice privileges. If indeed members of this class do desire to have these expanded privileges then they, like the rest of us must gain knowledge, and skill in the concepts of amateur radio operations by up grading their license class. Isn’t that one of the goals of the amateur radio service?

Effect-If the technician class constitutes fifty percent of the license holders, and they are granted enhanced privileges here is what the impact would look like:

For the 80 meter band-

If only 5% of the techs (17000) went to 3525-3600 with digital operations the regional and national traffic nets would be impossible to run and thus our loss of intercontinental traffic capability. If only 1% of the techs were to occupy the 3900-4000, with voice mode, the emergency voice and data communications of most of our states would be over whelmed and lose their ability to intra communicate, command and control, status reports, logistic distribution etc. during true emergencies.

For the 40 Meter band-

The lower portion of the band is already loaded with cw operation, existing digital operations, and foreign voice signals. The inclusion of tech data privileges would make this congestion, especially on weekends, and nights very difficult not to mention during contest periods.

The upper portion of the band is already crowded during the day, weekends, and during contest periods. At night when the band goes long can you image what the inclusion of just 5% of the Techs (17 thousand) would do to the signals and their ability to transmit information.

For the 15 meter band-

Petitioner continues to blame the commission for the award of the lower band frequencies of this band while at the same time advocating phone operations on the higher band frequencies as an incentive to upgrade.

Two questions arise; one isn’t the use of the lower frequencies enough of an incentive to upgrade, and two, why do they think adding more privileges in the band will make more incentive to upgrade?

As stated in my previous comments both statements, not only do not provide incentive to upgrade but in fact are incentive to not upgrade. So unless one believes that giving more increases one to get more, if what is already been given is so close to what is to gained then who would put in hard work, develop more skill, and study more complicated subjects just to get a extra small piece of the pie.

CONCLUSION

After reading the petition it is clear to me that the ARRL is:

Attempting to over state their importance in the amateur radio service, have only 21 percent of the amateur population, and since tech equal 50 percent of the population then they represent only 10 percent of the techs,

Do not support their contention that giving increased privileges will increase upgrading,

Are misstating the goals and desires of the tech license by stating they want to work the world, when in effect the majority of recent techs were driven to licensing due to a desire to provide local emergency communications and community service (very commendable to say the least),

Petitioner states over and over that the growth trend of new licenses must be increased. Therefore they have structured the petition because of a self interest and their own financial security. Could that be because the new young techs are not joining the ARRL as it does not offer very much for them?

Finally, it must be noted that the tech type radio, with vhf and uhf coverage, are very satisfactory to provide local communications, and are readily available on the market and with little cost (less than the cost of many hand held batteries) for the china import radios.

Just think what the expanded privileges in the HF sector with three hundred thousand techs would do for the ARRL with its association with major equipment manufacturers.

Therefore I conclude that the petitioner is only concerned with the petition for its own self interest, and does not benefit the existing hams and certainly does not have the best interest in mind for the Amateur Radio Service.

Respectively Submitted, Joe Overstreet, W1YV

ps: Of course I have many recommendations to get this whole thing in proper perspective but I will bypass this. If the ARRL cared about the imbalances between the license classes then they should quit BAD MOUTHING the FCC and form a task force to make recommendations to the FCC based upon supported facts for the betterment of the Amateur Radio Service. JO