Comments to FCC RM-11828

(Expansion of HF privileges to Entry Class (Technican) Licensees.

I am a 77 year old amateur radio operator, who was first licensed as a Novice, as WN7EKB in 1956, while I was still 13 years old. My present call-sign is W7EKB and I have remained licensed, and active, since I was first licensed. I have thus been an active Amateur Radio Operator for the past 63 years.

My career has been in the electronics and computer fields, where I have worked since I graduated from high school in 1960 and after performing my military obligations. I have been a member of the ARRL for a long time, although I could never afford a Life Membership, instead renewing my membership each year.

I am still very active in amateur radio, and especially in EMCOMMs and traffic handling.

I am vehemently opposed to every provision of the subject RMs, RM-11828, and RM-11759, and RM-16-239 and am requesting the FCC to REJECT all of the aforementioned.

I am replying to ARRL PETITION FCC ID 1022823795806.

**General.**

I am surprised, and disheartened, by the ARRL’s petition for several reasons.

1) Number one, it appears to me that the ARRL has not directly addressed the issue in question from the beginning of its petition, but has spent much of its time chastising the FCC for not administering the Rules regarding the Amateur Radio Service in a manner acceptable to the ARRL. This is, in my opinion, a total waste of time, and in addition is a misinterpretation of not only what the FCC is required to do by law, but also does not regard the present lack of support for the FCC from our federal government.

2) The ARRL, despite its true position to the contrary, appears to regard itself as the only representative of the entire amateur radio community. In point of fact, it really represents only about 21.7 percent of us. Furthermore, its reported sampling of the amateur radio ranks, 8000, with regard to this petition truly accounts for less than 2% of the number of amateur radio operators in the U.S. How anyone could regard this as an accurate sampling of the true wishes of amateur radio operators is beyond my understanding.

I regard the ARRL’s conclusions reached on this miniscule sample to be completely inaccurate and false.

**Concerning Emergency Communications and this petition.**

As I mention above, I have been heavily involved in EMCOMMs from my very early years as an amateur radio operator. As soon as I had upgraded to, first, my Conditional Class license, then an Amateur Extra Class license, I became very interested in what was eventually styled emergency communications (which, by the way is one of the primary reasons we are allowed to operate on such valuable frequencies in the HF spectrum in the first place), joining local traffic nets, and MARS in order to learn as much about this as possible, and to provide as much service in this mode as I possibly could. I became a very active member of the ARRL’s National Traffic System, and also mentored as many new hams as I could towards their becoming effective emergency communicators.

I upgraded my license to Amateur Extra Class sometime in the 1960s, while still being very active in NTS, MARS, and EMCOMMs in general. And I am still doing this. I am very active in the digital communications field.

I am also a VEC and have helped administer the amateur radio tests to a number of new hams.

From this it should be obvious that my experience should give me some authority in the following comments.

Almost all of those who have appeared before me and my compatriots for an amateur radio test within the past several years, have done so only to obtain the minimum grade license they would need in order to participate in VHF or UHF comms with such agencies as local Search and Rescue units, various law enforcement auxiliaries, etc. At least so far, very, very few have ever cared to upgrade their licenses in order to operate in our HF spectrum. In fact, I have seen very, very few EVER upgrade for ANY reason, despite urging by me and others.

Although the ARRL states that it is interested in “incentivizing” present holders of Technician, entry grade, licensees, and I am fully in agreement with this wish, it appears to me that this RM would NOT achieve those goals.

Why should a Technician licensee wish to upgrade so that he/she could operate in the HF spectrum, when those privileges are now being gifted to them without them fulfilling any necessary requirement to do so?

This is, obviously, flawed reasoning on the part of the ARRL.

**So-called “STEM” and Eductation.**

ARRL states, without any supporting documentation, that these expanded privileges for Technician Licensees will enhance participation in various so-called “STEM” and other such programs in higher education. This is false. STEM is a program in the higher education field, with which I have worked in my 30 years as an employee of the University of Idaho, and most beginning hams I have dealt with are either too young to even consider what STEM would mean to them, or are old enough to already have a career in their chosen field.

Having an “enhanced” Technician ham radio license will, most certainly, have very minimal, if ANY, effect, on their choices of career. Today is not like “the old days” where a ham radio license often led to a career in the electronics or even computer fields. That sort of “incentive” is no longer viable.

**Other Considerations:**

Technician Licensees already have considerable privileges, CW in the HF spectrum, 80, 40, and 15 meter bands, and voice on the 10 meter band. Yet, how many of our present Technician Licensees bother to use those privileges? Again, in my experience, none, although since I do not know every Technician Licensee in the entire U.S., I must suppose that there MAY be one or two who do use those. Yet, I have not seen any.

In addition, many frequencies in the lower, 80 (3.5 MHz.), and 40 meter (7.0 MHz.) amateur radio bands have been used for many years for amateur radio emergency traffic nets. Due to past requests for rule-making that the ARRL has, **without adequate input from users of those frequencies**, managed to urge the FCC to implement, all of our emergency manual (CW and Voice) traffic nets have been forced into smaller and smaller segments of our crowded bands until effective operations of those nets has become more and more difficult, and at times, when for instance the RTTY gang, does their “contests”, literally impossible.

Now the ARRL wants to “give” voice, and many other privileges to Technicians, most of whom have no experience or understanding of how crowded our bands have become, have minimal or no knowledge of how their equipment is supposed to work, have minimal, if any, knowledge of the requirements of the FCC, nor how to act as “gentlemen” towards one another in that crowded space, nor the relative importance of our emergency traffic nets are to the general welfare.

This is completely unnecessary and fraught with problems.

Since emergency operation and experience for SOME Technician Licensees appears to be desired by the ARRL, in many cases, it has been proven, repeatedly, that when Technician Class Licensees ARE involved in emergency communications, that due to the requirements of the FCC, those operators are always overseen and supervised by higher-classed licensees. Therefore emergency communications is no reason to “give” them the expanded privileges that the ARRL so seemingly wants for them.

It also appears that, if the ARRL is correct in stating that 50% of presently licensed amateur radio operators are Technician Class Licensees, that dumping even a small percentage of those folks into our already overcrowded bands, with their minimal experience, lack of technical and legal knowledge and experience, and lack of respect for those of us who have “gone before”, will simply overwhelm our present operations, and especially, our emergency traffic nets.

**To Sum up:**

1) The ARRL’s reasoning for the necessity for this RM is completely flawed and untenable.

2) There is simply NO INCENTIVE for any Technician Class Licensee to upgrade to a higher-class license within this RM, if it is permitted to be added to the Amateur Regulations.

3) The effect of even a small proportion of already-licensed Technicians on our already crowded bands, ESPECIALLY as those bands are presently so horribly and poorly constituted, will be, in my opinion, nothing short of catastrophic with regard to EMCOMMs.

4) The present rules regarding Technician operations ALREADY provides all that is necessary for that class of operator’s participation in local EMCOMMs operations. This RM will do NOTHING to enhance that.

Therefore, I respectfully request that the FCC completely ignore, and REJECT this request for rule-making and throw it into the nearest “round file” where it properly belongs. It should never have been submitted.

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