

## **BRIEF REPLY COMMENTS IN RM-11828 TO ARRL, ROBERT STEPHENS ET AL**

This comment ID: 1051273725881 demonstrates the inseparable nature of RM-11828 from RM-11708, 16-239, and RM-11759. It also demonstrates clearly the flaws in the arguments of ARRL and emergency communications supporters of these measures. **I URGE THE FCC TO TREAT ALL OF THESE RULE MAKING PROCEDURES IN ONE OMNIBUS R&O.**

Stephens asserts: "Allowing them to operate in data sub bands and limited voice sub bands, lets them use Winlink for emergency emails and to be involved in HF EMCOMM voice nets. "

The FCC has in the past stated that to obtain HF privileges, it is simple to take a test for General class. There has been NO CHANGE since that decision to justify altering the license structure or privileges. In many cases, the Technician license has been exactly what "makers" wanted to control a robotics experiment, or model aircraft users wanted to get better performance from their STEM activities. The ONLY reason current Techs have any HF privileges now, is that the Novice class was abolished, and those privileges folded into the Tech. The Novice should have been continued as NON RENEWABLE. Some current Techs are now grouching about what they have is no good. If they do not like the privileges they have, the FCC has the direct solution to their discontent: study the material, and pass a test for General.

To see an emergency communications advocate whining about lack of Technician access to HF VOICE and DATA privileges is simply ludicrous. ANY SERIOUS emergency communicator has already studied the material to acquire the following certifications. The courses are:  
Federal Emergency Management Agency (FEMA) Independent Study program:

- a. IS 100.c - Introduction to the Incident Command System (ICS)
- b. IS 200.b - ICS for Single Resources and Initial Action Incidents
- c. IS 700.b - An Introduction to the National Incident Management System
- d. IS 800.c - National Response Framework, An Introduction

The following ARRL courses are highly encouraged:

- a. EC-001, Introduction to Emergency Communication
- b. EC-016, Public Service and Emergency Communications Management for Radio Amateurs
- c. EC-015, ARRL Public Relations

These are the REQUIRED courses and certifications specified by our local ARES and RACES Emergency Coordinator, Hugh Bahar, who has filed comments in these proceedings.

Anyone claiming they are a legitimate emergency communicator who has NOT obtained the above certifications is bogus.

More importantly, if they have the intelligence to pass the above tests and certifications, they also possess the same talent to acquire certification as a General class FCC licensee. If they don't possess both of these qualifications, they have no business on the HF bands or doing long range emergency communications.

This group of ARRL petitions has one purpose: to lower the standards of exams for Tech to allow yacht owners to use free HF email systems, and expand it to the entire CW/DATA segment with UNLIMITED BAND WIDTH, or 2.8 KHz band width anywhere. There are numerous unlicensed users of winlink who cannot pass a General exam. RM-11828 lowers the standards so the call sign bootleggers can get legal. That is ALL RM-11828 is about, ARRL claims to the contrary notwithstanding.

**Please immediately REJECT RM-11828, RM-11708, 16-239, RM-11759 in an Omnibus R&O.**

Respectfully submitted,

/s/

Janis Carson, AB2RA