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Comments in the matter of:
PR 92-167

Regarding foreign Amateur Radio Operators
2 September 1992

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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FCC MAIL BRANCH

I am Bruce Frahm KØBJ. I have been an FCC licensed Amateur for 24 years eleven months, and Extra Class for over 20 years. I have some familiarity with licensing issues in foreign countries, having obtained operating permission and operated Amateur Radio stations for periods of a few days to a few weeks in the following countries: Australia, Belize, Pitcairn Islands, Vanuatu, Cayman Islands, New Zealand, Western Samoa, Kenya, Easter Island (Chile), Bahamas, Spain, England, Ecuador, Solomon Islands, Finland, Canada, Fiji and the Panama Canal Zone. I have also been licensed to operate in French Polynesia but have not exercised those privileges to date. These operations have taken place from 1979 to the present.

I am essentially in complete agreement with the NPRM as reported in the August 15 W5YI Report. I would suggest that it be made clear that the 60 day permit could be sought concurrently with, before, or after applying for either an FCC issued regular Amateur license or reciprocal permission. I would further suggest lengthening the validity of the operating permission to be granted under this NPRM. My foreign licenses have ranged in validity, I believe, from 1 month to one year, and in a couple cases for life. I can see very little reason for not granting permission for at least 6 months, and it may significantly benefit some applicants. 60 days is barely more than best-case turnaround time for current Amateur License applications, and strikes me as arbitrary and unduly short.

According to the W5YI Report, Mr. Quello sees a disadvantage for US amateurs if the NPRM is adopted in that there may be no incentive for foreign governments to conclude a reciprocal agreement. I feel there is more to be gained than lost for US hams with this NPRM. Of my operating permissions, some are based on formal reciprocal agreements and others are granted by "courtesy", much as in the instant proposal. While I can't be precise on this point, it is my feeling that it has been on average simpler and speedier obtaining the courtesy type licenses than the more formal ones. That would certainly appear to be the case for licensing under this NPRM. Many, but not all, countries which have not signed reciprocal agreements with the US, provide such courtesy permission. If Mr. Quello's concerns are shared by others, possibly the proposed US courtesy licensing could be denied to applicants from countries not accommodating US amateurs - a sort of de facto informal reciprocal system. Although I would not be strongly opposed to such a position, I suggest that offering our permission unilaterally might persuade the majority of non-signatory countries to do likewise for us.

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In at least one case - Kenya - existing licensing for US expatriates has been jeopardized by a Catch-22 situation. Kenya recently expressed its desire to formalize its heretofore courtesy licensing of foreign nationals through reciprocal agreements, and declared its willingness to conclude agreements with any willing countries. However, the USA and Kenya each steadfastly refused to INITIATE the proceedings! A unilateral courtesy license for foreign nationals in the USA would go a long way toward insuring such silliness doesn't occur again.

As pointed out by FCC, this proposal would enhance international goodwill, could be done at virtually no cost to FCC, and I believe would involve very little risk of misuse of Amateur frequencies. Amateurs, long known for improvement of techniques through emulation, would be exposed to different and potentially beneficial procedures, as well as having increased chances of direct personal fellowship with foreign hams.

Given the highly developed state of communications technology, I see virtually no national security concerns with this NPRM, especially given the open type of society we have in the USA. I give my wholehearted support to this NPRM, especially with the additions suggested in the second paragraph of my comments. Thank you. Sincerely,



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