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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

WASHINGTON DC 20554

NPRM# 92-167

IN THE MATTER OF AMENDMENT OF SECTION 97

SPECIAL LICENSING FOR VISITING FOREIGN AMATEUR RADIO OPERATORS

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MAIL BRANCH

Comments by

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AMATEUR RADIO STATION NE8I
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DEAR COMMISSIONERS,

After reading the article in October QST on the proposal for special licensing for visiting foreign hams, I would like to submit the following comments for consideration.

I am in favor making it easier for foreign amateur radio operators to get permission to operate in the United States and possessions, or to provide an additional avenue of approach for these priveledges. International Amateur Radio has provided a great deal of international fellowship and international good will, as well as assisting with emergency communications as well a courtesy in the visiting guest, a foreign land (the USA). I find a number of the suggested provisions in this docket, puzzling. I notice that there is a term license proposed limit of not to exceed 60 days. Is this an international understanding or local to the USA suggestion? Licenses in most foreign countries seems to be 1 or 2 years. If someone is here for 90 days, this would seem to cause alot of extra paperwork. I would think it would be more appropriate to authorize operation for up to 1 or 2 years. Espicially since an exam is being given to the visitor. 60 days is too limiting, espicially considering how difficult it is to attend a scheduled VEC exam. Here in Detroit when the FCC administered the exam, there were 16 exams held in a typical month. Now there are one or two.

One detail not included in this NPRM I would think should be included is added logging requirements. Due to the nature of the intended operations, I think that logging of all operations, at least times of operations, and locations along with modes, bands and station set up information, should be required. If a question came up that needed to be answered, it could be difficult and time consuming to contact the visiting amateur once they have left the US. I would suggest that this log should be required, then submitted to the examining VEC's on the visitor leaving the country, so that the FCC would have access to this information. In a sense, the VEC is responsible for letting them operate. The VEC should then once a year make an account of these logs and exams issued, and make the Amateur community aware of the service

that has been provided, and the extent this privilege is used.

I was a supporter of PRB-3, the licensing docket, in fact I still am. I think that any visitor should be able to obtain a visitor's distinctive US callsign. I think the VEC should be able to call a central databank, and obtain a sequential callsign from an available block. Portable callsigns are usually a mouthful. A distinctive callsign would make a nice souvenir, as well as help make the visitor feel more like one of the gang. So the successful visitor should be able to choose from using w/their callsign or a 'w' call. I would suggest setting aside the part of the 'D' block of calls WV1AAA to WVOZZZ for continental 48 states visitors, WW1AAA to WWOAAA for visitors to KP areas, WX7AAA to WX7ZZZ for KL7 and WY1AAA to WYOZZZ for visitors to KH areas.

The license should be issued as the current license is, as a certificate suitable for framing, and a pocket version to keep on one's person.

Because the US administers Spanish speaking areas, Puerto Rico, the exam should be available in Spanish as well as English. In fact, I think that this exam should be available in the major UN languages as well. One reason I suggest this, is that many visitors may speak English or Spanish well enough to get by, however they may have problems with the written language, and really what is necessary is for the applicant to understand what is meant. I also think that the VEC should provide copies of FCC part 97 to the applicant, as well as a guide to US operating information, ideally in 2 languages, their's and English. This may help visitors with questions, and to avoid violating FCC rules and regulations.

My most major concern with this proposal is the VEC problem. Prior to the VEC's, exams were available at all FCC offices, including Hawaii and PR every week of every year, in fact in most offices twice a week. So here in Detroit, Amateur Radio exams were offered twice a week. From looking at the schedules, which are published in many of the club bulletins, it is now about

once a month. However, they are now given in several locations, so applicants do not have to drive as far. Unfortunately exams are by appointment and by pre-arrangement only now. Exams when they were offered by the FCC were normally walk in. So now, it is much more difficult to even find and get to A VEC exam point. What happens if the VEC does not show? There is also this problem of money. I see in every docket involving licensing, is that the VEC's have to recover costs. Amateurs were among the first to cheer when fees for licenses were dropped. And among the first to complain when license fees were proposed to be reinstated. When the VEC program came on line, amateurs complained about the costs. There were not about to do it for 'free'. The spirit of public service seems to stop where postage or a tank of gas is concerned. My problem with license fees was that all the money went to the general fund, and none of it to the FCC, to offset the costs of doing bussiness, or the costs of monitoring the airwaves. When I investigate a TVI complaint, I do not get any money from the Ham, the next door neighbor or the government. In fact I do not even get a tax break of any kind, no matter who is at fault, even when I find the problem was a bad thermostat on an electric blanket at the complainees house. When I lost 220.0 to 222.0 MHz, the new bussiness users of this band that I used every day were not required to offset my losses, nor did I get a tax break like they do if they incurred expenses. Nor do they pay the government or the people for the commercial gain and use of this new bussiness band. I think the visitor license along with the Novice license, and exams to Handicaped or financially disabled people should be done gratis. If a club, or group of hams wish to offset the expenses for the VEC, fine, they should be able to. In fact, it should be the duty of clubs when raising funds, to help visitors, new and disabled hams. If fees are going to be charged, The FCC's processing and handling expenses should also be included, and go directly to the FCC. I would not complain so much if the VEC community gave weekly, walk in exams, to equal the service which the goverment (FCC) formerly provided, which it has not.

I think the FCC should consider allowing any three Extra class amateur license holders to be able to administer this exam, the same as a Novice exam. That is send away for an exam, have 15 days to administer and return it, along with the relevant information. This way it can be tracked and is truly widely available, not just to a lucky few who are able to attend an infrequent VEC exam, or know somebody.

Thankyou for reading and considering my comments.

Lloyd Ellsworth

Amateur License NE8I, for 26 years.