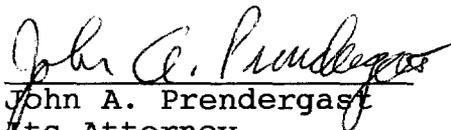


requested that the Commission institute such proceeding at this time.

Respectfully submitted,

**The National Association of
Radio and Telecommunications
Engineers, Inc. (NARTE)**

By: 
John A. Prendergast
Its Attorney

Blooston, Mordkofsky, Jackson
and Dickens
2120 L Street, N. W.
Washington, DC 20037

Dated: November 2, 1992



THE NATIONAL ASSOCIATION OF RADIO AND TELECOMMUNICATIONS ENGINEERS, INC

P.O. Box 678 • Medway, MA 02053 • (508) 533-8333

NARTE BACKGROUND SUMMARY

A. Background

1. The National Association of Radio and Telecommunications Engineers, Inc. (NARTE) was founded as a non profit membership/certification organization in 1982. With the advent of Deregulation and the Federal Communications Commission "encouragement" for private industry to establish certification standards to fill the licensing void, NARTE initiated and developed a comprehensive certification program for engineers and technicians.
2. In 1988, the certification program was expanded to include the discipline of Electromagnetic Compatibility (EMC). A Naval Command requested NARTE become the administrative agent for EMC certification. By mid 1991 a command of the U.S. Army also formally requested NARTE to become their certification agent for EMC engineers and technicians.
3. To date over 11,000 Telecommunications and EMC engineers and technicians have been certified. The credibility of the NARTE certification has prompted many of the telephone, rail, power line, and industry corporations to mandate or prefer NARTE certification as a pre-requisite to employment.
4. NARTE is governed by a Board of Directors (12) who serve at the pleasure of the membership and who receive no compensation in any form. Policy is formed at the Director/Officer level and promulgated to the NARTE Executive Director for implementation. All Directors and Officers must hold a current NARTE Class I certification and/or an EMC certification.

B. Description

NARTE offers certification based on education, experience, supervisory and peer references and testing. In telecommunications there are four certification levels for technicians and three levels for engineers. Entry level is Class IV for Technicians and Class III for Engineers, however initial certification may be at a higher level depending on years of experience, reference support and testing. Certification is offered in RF, non RF, and/or both, depending on expertise and more than a score of additional endorsements in specified specialty areas may be awarded to the basic certificate.

EMC certification encompasses the same four criteria of experience, education, references and testing. In this area one is certified as either an EMC Technician or Engineer. Testing is mandatory, but may be taken at any time even though the requisite number of years experience have not been met. Certification as a Technician requires six (6) years of EMC technician experience. Nine (9) years of engineering experience are required for engineer certification.

C. Avenues to Certification

1. Eligibility; Any individual who can demonstrate the requisite experience, education, and provide references to support competency is eligible to apply for NARTE certification and membership.
2. Methods for obtaining membership and certification are:
 - (a) By examination through a NARTE accredited Testing Center. NARTE has established testing centers at more than 120 universities and colleges throughout the US, to include Alaska, and Europe.
 - (b) By examination through one of the Defense Activity for Non-Traditional Support (DANTES) testing locations.
 - (c) By Direct application to NARTE for Military and DoD personnel who served with or supported "Desert Shield/Desert Storm". (Applications must be received prior to 31 December 1991 and the initial application fee for these individuals has been waived).
 - (d) By "Grandfathering". This route to certification will reopen for EMC Engineers and Technicians for a period of 1 year commencing with the official implementation of the Memorandum of Agreement between the U.S. Army Command and NARTE. (To be Announced.)

D. Certification Requirements

1. Telecommunications
 - (a) Class IV Technician: Pass Test (75%); One (1) supporting reference from a current supervisor and/or

instructor; evidence of completion of a course or study in radio or telecommunications electronics.

(b) Class III Technician: Pass Test (75%); Two (2) references, one from a current supervisor and one from an individual who is familiar with the work of the applicant; evidence of having completed a vocational training course through an educational institution or an internal company training course; have a minimum of two (2) years experience.

(c) Class II Technician: Pass test (75%); Three (3) references, one from a current supervisor and two personal references from individuals familiar with the applicants work; have four (4) or more years of verifiable experience in the radio or telecommunications industry and submit evidence of completion of training.

(d) Class I Technician: Pass Test (75%); Four (4) references, one from a current supervisor and three personal references from individuals familiar with the applicants work; six (6) or more years of verifiable experience in the radio or telecommunications industry and submit evidence of completion of training.

(e) Class III Engineer: Pass test (75%); BSEE degree or equivalent and/or a minimum of four years of verifiable experience as a bona fide telecommunications engineer; Four (4) references, one (1) from a current supervisor and three (3) personal references from individuals familiar with the applicants work.

(f) Class II Engineer: Pass Test (75%) BSEE degree or equivalent and/or a minimum of six (6) years of verifiable engineering experience as a telecommunications engineer; four (4) references, one (1) by a current supervisor and three (3) personal references from individuals familiar with the applicants work.

(g) Class I Engineer: Pass Test (75%); BSEE degree or equivalent and/or eight (8) years of verifiable experience as

a telecommunications engineer; Four (4) references, one (1) from a current supervisor and three (3) from individuals familiar with the applicants work.

(h) EMC Technician: Pass Test (70%); Six (6) or more years of bona fide experience as an EMC Technician; graduation from a school or college with a curriculum in electronics technology; Three (3) references, one from a supervisor and two (2) from individuals familiar with the applicants work; 10 multiple choice questions suitable for entry into the EMC Technician Test data bank.

(i) EMC Engineer: Pass test (70%); Nine (9) or more years of verifiable experience as an EMC Engineer, and/or BSEE or equivalent (transcripts required); The number of years of credited college work count as part of the nine years of required experience; Post graduate degrees may count as an additional year of experience and up to two years of teaching experience may be allowed. Three (3) references, one from a supervisor and two (2) from individuals who are familiar with the applicants work; ten (10) multiple choice questions suitable for entry into the EMC Engineering test data bank.

E. Recertification Requirements

1. Each level of certification is valid for a period of one year and is renewable by providing NARTE assurance that the individual is still practicing in his/her field and by remitting the annual renewal fee.
2. Specific achievements and/or educational courses completed during the past year should be identified to NARTE annually.

F. Upgrade

Individual certified at levels other than Class I in telecommunications may upgrade to the next level upon meeting the prerequisite criteria for that level.

G. Revocations

NARTE shall have exclusive authority to revoke certification(s) of any individual(s) who;

1. Practice deceit or fraud in obtaining a certification.
2. Are found guilty of negligence, incompetency or misconduct in the practice of EMC or Telecommunications engineering or technology as a certified engineer or technician.

H. Materials and Assistance

Brochures, pamphlets, applications and other materials and information may be obtained by contacting NARTE at:

P.O. Box 678
Medway, MA. 02053

Telephone (508) 533-8333

I. The application and examination process

1. Interested applicants should write or call NARTE to request an application package.
2. Forward the completed application package to NARTE where a determination will be made as to the appropriate certification level.
3. NARTE will effect the necessary coordination with the testing center, to establish a testing time, date, location and the name of the individual to contact and provide the applicant with a letter of introduction to the test proctor.
4. NARTE will insure that the appropriate tests are available at the testing site by the examination date.
5. Telecommunications test will be graded on site and the applicant advised as to pass or fail. EMC examinations will be returned to NARTE headquarters and applicant will be advised within 15 working days as to pass or fail.

6. Examinations may be retaken following a waiting period of not less than 90 days and by remitting a test processing fee of \$20.00.

J. Certification fees

Telecommunications	Initial	Renewal
Tech IV	\$15	\$15
Tech III	20	20
Tech II	25	25
Tech I	30	30
Engineer III	40	40
Engineer II	50	50
Engineer I	60	60

Additional endorsements are \$5.00 each up to a maximum of \$30.00 on the initial certification only. There is no renewal charge for endorsements already granted.

EMC Technician	\$40	\$40
Engineer	40	40

NARTE test processing fees are \$20 for all levels except Technician Class IV which is \$15. This amount will be credited toward the certification fee with successful passing of the appropriate examination.

Some Testing Centers may charge a nominal test administration fee depending on testing location.

K. Administration of NARTE Examinations

1. Continental U.S. Test Centers (including Alaska and Hawaii) may administer NARTE telecommunications examinations quarterly or, in exceptional cases, on a demand basis. EMC examinations are administered quarterly.

2. Examinations may be postponed if;

a. testing materials are received after the scheduled testing date.

- b. extraordinary circumstances such as military exercises, etc. force the examinee to miss the testing schedule.

K. Refunds

Membership/certification fees and test processing fees are non-refundable. However once membership/certification fees are paid, they will be fully credited to the applicant and remain valid until such time as the applicant successfully passes the examination.

L. Security

1. The secure handling and storage of NARTE examinations is essential at all times. Examinations will be forwarded to the testing center to arrive at least five (5) days prior to the schedule testing date. Completed examinations should be returned to NARTE within two working days following testing.
2. Should an examination(s) be compromised or suspected of compromise, NARTE should be immediately advised.