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FEDERAL BRANCH

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Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of)
)
Comments on the)
Amendment of the Amateur Service)
Rules to Include Novice Class)
Operator License Examinations)
in the Volunteer-Examiner)
Coordinator Examination System)

PR Docket No. 92-154

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Dear Sirs:

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In replying to the various comments regarding flexibility in Novice Class License Examinations, I make the following suggestion, namely to place the Novice testing by General Class, and above, under the Volunteer-Examiner Coordinator System as proposed, but to write the new rules broad enough to permit giving candidates an examination at a location and time convenient to the Novice candidate as well as the examiners.

To clarify the above, let me say that I applaud the proposal in PR-92-154 to place the Novice examinations in the hands of accredited Volunter Examiners. However, I must agree that the present system has many advantages, when we are all attempting to increase the number of Amateur operators who are licensed. It is desireable, in my experience, to be able to give an examination under conditions where the candidate can be made as relaxed as possible. The distractions and delays encountered at a regularly-scheduled VE session for all license levels tend to make the novice candidate more nervous. This, after travelling a distance of 40 or 50 miles to reach the examination site.

As an educator as well as a Volunteer Examiner, I see the advantages as well as the disadvantages of PR-92-154. In our classes, we like to test Novice candidates for Theory as soon as they are ready. Attaining Code proficiency often takes a bit longer. This way, the candidates can obtain a feeling of confidence and accomplishment if they pass Element 2.

My suggestion would essentially establish a second examination procedure and paperwork "track", somewhat similar to the one now existing for Novice examinations. One difference is, obviously, that three VE's will be required instead of two. A public announcement, while required, would permit the examination session to be held the next day, if necessary. Sessions could be limited to as few as one candidate.

While the existing rules do not preclude the latter conditions, I feel they need to be considered when preparing guidelines, particularly those prepared by the Volunteer Examiner Coordinator offices as instructions to VE's.

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The paperwork track would, of course, be from the VE's to the VEC office, who after checking would forward the Form 610 application by the candidate to Gettysburg. All that is really needed to reduce the number of inaccuracies on Novice 610 Form submissions is to have the form reviewed by another trained party. Hopefully, however, bringing General Class examiners into the VE system will provide sufficient training to reduce errors on the 610 Forms to an absolute minimum.

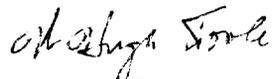
Additional paperwork under the VEC system involves sending a Test Session Report, and possibly a Candidate Roster to the VEC office, together with the examinations and answer sheets. (Nomenclature is that of the ARRL/VEC.) This should be kept to a minimum. At least the Candidate Roster and Test Session Report should be combined for Novice exams not given at a "full" VE session with two or more license classes being offered.

It appears to me that this suggestion is largely in accord with PR-92-154, particularly the revised Section 97.511. As indicated above, the two-VE system could be made to work, however, three VE's reduce the possibility for error, and, in addition have the advantage of providing additional space on the back of a crowded Form 610.

As an additional comment, our VE team sees the addition of General Class VE's as adding to the possibility of confusion in completing the paperwork. It is difficult enough now to keep all examiners up to date as to what is, or is not, correct. However, I welcome the General Class VE's, in the hope they will become encourage to upgrade to Advanced Class.

I trust this will be considered as my thinking regarding how to answer the two major difficulties: (a) how to compensate for need to travel long distances for an examination, whether in Pennsylvania, or in Montana, and (b) why place restrictions on testing by "Elmer's", either in his, or the candidate's home? I believe both these are answered to a large degree. I know that it gives on a great satisfaction to teach radio theory and practice to someone, and then have the student obtain his first license. This has been my experience, and I would not want to take it away from any other Amateur.

Sincerely yours,



W. Hugh Toole KC3IE

5 Well Fleet Drive
Media, Pennsylvania 19063
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