

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
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In the Matter of

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

MAIL BRANCH
PR Docket No. 92-154

To: The Commission

REPLY COMMENTS OF W5YI-VEC

The W5YI-VEC was one of the two original petitioners suggesting that the separate Amateur Radio Novice license testing program should be folded into the VEC System.

We have obtained copies of many comments on this docket from the Commission and several commenters have forwarded us their views. In many cases we have noted a complete lack of understanding of the objectives of this proceeding on the part of amateurs who now participate in the Novice testing program.

While there are many side benefits, the primary purpose of bringing Novice testing under the VEC System is to improve testing efficiency and communication between the applicant, those administering the examinations and the government.

Many commenters appear to be totally unaware that there is to be substantially no change in the manner in which a General (or higher) Class amateur may participate in the amateur radio testing program. The changes proposed are minimal. Expense

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reimbursement while authorized is not required. In short, the General Class amateur will still be able to conduct the examination in just about the same way and at the same locations as previously was the case.

A Novice license training class or "Elmer" may still examine their students or apprentice at the end of the course or training period with the assistance of other examiners. It is not necessary that the Novice applicant journey to an outside VEC testing session. They may conduct their own examinations as before and at the same sites. The primary difference is that the three examiners would have to be registered with and be able to obtain the appropriate updated examinations, forms and instructions from an authorized VE coordinator.

General Class VEs need guidance

It should be pointed out that it is the VEC's and not the government who are charged with maintaining the Element 2 examination questions utilized in Novice exams. At present, there is, no organized way for the VEC's Question Pool Committee (QPC) to identify or supply the Novice testing community with updated information necessitated by regulatory and technology changes.

There is a chain of command from the government through the VEC organizations (and their Question Pool Committee) to the VE

team for all amateur radio license classes except the Novice level. Government oversight of the Novice testing program is not only lacking but is made worse by current Commission fiscal and manpower constraints.

Amateur licensing department personnel at Gettysburg are unable to benefit from prior VEC screening of Novice answer sheets, applications and attachments. Statistics show that the accuracy of Novice applications is more than ten times worse than that of those currently submitted through the VEC System since there are no formal instructions to Novice level examiners.

The publishing marketplace is primarily the source of Novice examination materials and information. The marketplace certainly can not react as fast as a QPC directive advising all VECs, for example, that a specific (now obsolete or inaccurate) question is to be deleted from all Novice examinations or that a new question set must be utilized as of an effective date. As a member of the QPC, I know that much information on the shelves of bookstores is either outdated or does not contain recent revisions, deletions and additions to the testing program. This must be corrected.

All VECs keep their testing teams informed. The application screening process not only supplies a more accurate (and cost effective) product to the government, but it also serves to alert the VEC as to possible testing information which should be supplied to VE teams in the future. The communications gap that

exists in the Novice testing program should be closed.

The General Class VE and the Technician examinee

We also note from written and oral comments that some General Class examiners are considering the proceeding as an indication that the government has lost faith in their integrity or their competence to conduct examinations. Nothing could be further from the truth.

Some consider the privilege of examining newcomers for beginning licenses as one of the benefits of being a General Class amateur. The testing function contributes to their self-esteem. While we understand this position, there certainly is no intention or the part of the petitioners or the government to discredit or down-grade General Class examiners.

Quite the contrary, the General Class amateur actually represents a potentially valuable resource in the examination of beginners. The entry licensing path chosen by the greater majority of newcomers to amateur radio today is the Technician Class. In Fiscal 1990, 88% of first time amateurs came in at the Novice level. Fiscal 1992 statistics show that 73% of all examinees now enter at the Technician Class. This drastic change is primarily due to the new absence of a telegraphy requirement in the Technician Class. Novice Class entry has dramatically declined since 1990. The decrease in the number of new Novice

licensees between Fiscal 1991 and 1992 was 38% alone.

The statutory regulations permit the General Class amateur to examine amateur radio license classes of a lower level. In view of the massive influx of beginning amateur radio operators at the Technician level, we believe that the accredited General Class VE should be permitted to examine not only the Novice, but the Technician Class as well. There are potentially as many General Class examiners for the burgeoning Technician Class as the Advanced and Extra Class put together. There can be no doubt that the Technician Class needs VE's more than the Novice level.

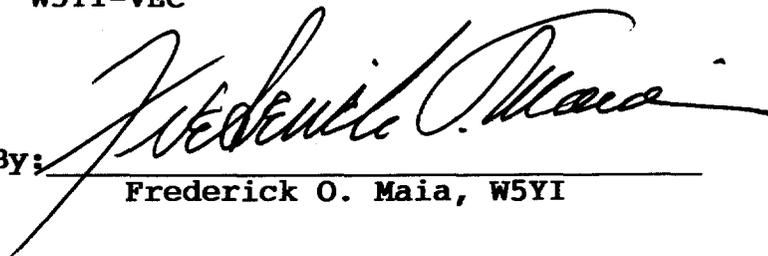
Allowing the General Class VE to examine Technicians would also demonstrate to the General Class amateur that the government and VEC community does indeed have confidence in their judgement and capability to perform the examination function and that dealing with a VEC rather than direct with the government does not represent a loss of privileges. The new rules would add "privileges."

There is also another benefit that accrues to VEC's when General Class VE's are allowed to participate in the examination of the Technician Class. The VEC's currently have two tiers of examiners. One, Advanced and Extra Class VE's currently participate in the examination of Novices and Technicians and secondly, the Extra Class examiner tests all other Classes.

A third set of instructions and materials would have to be added to the VEC System when the General Class examiner joins the VEC System. It would be far more efficient from a cost and administration standpoint - especially to the smaller VEC organization - to simply add the General Class VE to the current Advanced/Extra Class VE instructions and retain the current two tiers of examiners.

In doing this, the pool of potential Technician Class examiners (there are more than 225,000 General and Advanced Class licensees) would be more than doubled and unquestionably more in line with the demand for Technician Class examinations. The General Class VE should gain self-esteem in that they would be expanding their examination responsibilities rather than having the opinion that the proceeding simply adds another supervision level to their testing function.

Respectfully submitted,
W5YI-VEC

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