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FEDERAL COMMUNICATIONS COMMISSION  
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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
Amendment of the Amateur Radio )  
Service Rules to Include Novice )  
Class Operator License )  
Examinations in the Volunteer )  
Examiner Coordinator Examination )  
System )  
 )  
PR Docket No. 92-154 )

MOTION TO ALLOW LATE FILING OF REPLY COMMENTS  
BY THE ARCTIC AMATEUR RADIO CLUB, INC.

The Arctic Amateur Radio Club, Inc., ("AARC"), by and through its undersigned counsel, hereby moves that it be allowed to file late reply comments in this matter, and offers herein to show good cause for the Commission to relax its rules and allow late filing, pursuant to §1.3 of its rules (47 C.F.R. §1.3). The proposed reply comments are enclosed herewith.

AARC, one of the oldest amateur radio clubs in Alaska, is incorporated as a non-profit corporation under Alaska law, and has been independent of but affiliated with the American Radio Relay League, Inc. ("ARRL" -- a party hereto)

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for much of AARC's fifty-four year life. AARC did not file original comments in this case, in part because other Alaskans were known to be expressing concerns shared by AARC, and (as can be seen from the affidavit of this counsel, filed herewith), AARC's counsel was in contact with counsel for ARRL on the date he was completing its reply comments, and was given no indication of the strange promises that would be made by ARRL directly affecting the Alaskan issues in this case.

That is, AARC's Reply Comments arise entirely because of these statements of ARRL in its Restated Reply Comments (relating to Alaska and to the positions of the Alaskan parties who had filed comments) which first appeared in those Reply Comments. ARRL's surprising document with this new material was apparently filed on November 10, 1992, but no one in AARC (see the affidavit) had any knowledge nor notice of these Alaskan-related statements until mid-December 1992. Thereafter, it was necessary to wait for a regular meeting of the Board of Directors of AARC, and it became prudent for counsel for AARC to contact as many as possible of the Alaskan parties who had filed comments in this case, to determine how to deal with this new development.

The "good cause" shown here is simply that ARRL, in its last filing as to which no reply would normally be allowed, inserted its new (and unexpected) promises regarding VEC

service to Alaska, promises which are impossible for ARRL to keep (as is argued in AARC's proposed Reply Comments). Indeed, the promises are so sweeping and imply such a vast financial outlay by ARRL, that to anyone familiar with the logistics, topography, travel costs and cost of living in Alaska, they verge on the ludicrous. It is inconceivable that any member of AARC or, indeed, any of the Alaskan parties who did file comments, would ever have anticipated that such statements and promises would be made.

If this motion is not granted, the FCC may well be addressing issues that affect Alaska and deciding those issues in reliance upon these same promises and assurances by ARRL, which simply cannot be kept.

AARC does not seek to reopen all matters for comment: on the main issues, many of the Alaskans have already spoken well.<sup>1</sup> AARC does not seek to change whatever tentative conclusions might have been reached by FCC staff regarding this docket as it affects amateur operators and prospective novice operators not in Alaska. Also, AARC and its counsel apologize for any inconvenience caused to FCC staff because of this late filing, but it could not be helped, as can be seen from the matters recited in the accompanying affidavit of this counsel, and from the concerns stated in the proposed reply comments.

<sup>1</sup>AARC applauds the comments of Roger Hansen, KL7HFQ, of the Anchorage Amateur Radio Club VEC, which coordinates most Alaskan amateur exams. (The ARRL-VEC does very few.)

The Arctic Amateur Radio Club, Inc., urges that "good cause" has been shown by this motion, counsel's affidavit, and the proposed comments, and that AARC's Reply Comments be filed and considered in this case.

DATED at Fairbanks, Alaska this 28th day of January, 1993.



Frederic E. Brown,  
Attorney for the  
Arctic Amateur Radio Club, Inc.

**CERTIFICATION OF  
SUPPORT FOR GRANTING THE CURRENT MOTION**

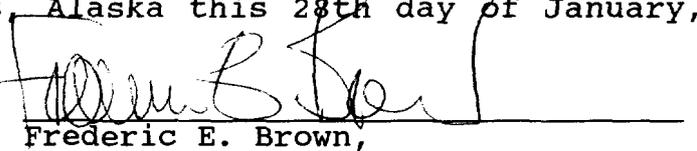
The undersigned, as an attorney and as an officer of federal and state courts in Alaska, hereby certifies that the following persons or parties who earlier filed comments in this Docket, have expressed their support for the current motion and have authorized the undersigned to so state in this document:

Anchorage Amateur Radio Club - VEC;  
Roger Hansen, KL7HFQ;  
Robert Caldwell Wilson, AL7KK;  
Dr. Robert O. Baker, Sr., NL7UH; and  
William John Raynsford, AL7JK.

(AARC was not able to contact Craig S. Chansler, another Alaskan who also filed comments.)

Additionally, while the Juneau Amateur Radio Club ("JARC") did not file comments, its president and board of directors have authorized this counsel to state that JARC also supports the current motion.

DATED at Fairbanks, Alaska this 28th day of January, 1993.



Frederic E. Brown,  
Attorney for the  
Arctic Amateur Radio Club, Inc.