

**Before the
Federal Communications Commission
Washington, DC, 20554**

In the matter of

TECHNOLOGICAL ADVISORY
COUNCIL (TAC)
TECHNICAL INQUIRY INTO
REFORMING TECHNICAL
REGULATIONS

ET Docket No. 17-215

REPLY-TO-REPLY OF BRUCE PERENS

28-November-2017

1. Introduction

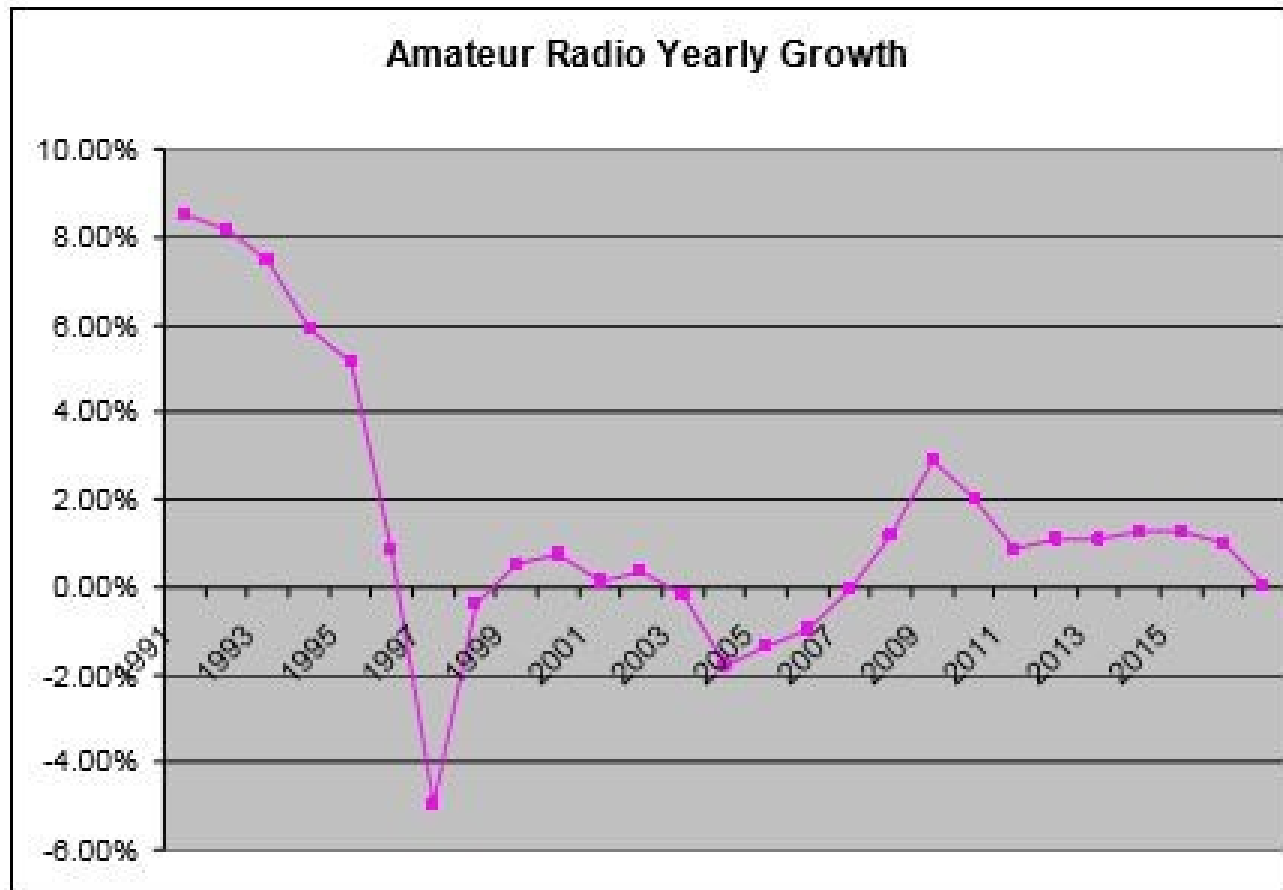
This is a reply to one of the very many comments in this proceeding made by Janis Carson, and I also bring up some administrative points.

In Ms. Carson's comment at <https://ecfsapi.fcc.gov/file/11270483930642/FCC%20OET%2017-215%20REPLY%20PERENS%20PURPOSE.pdf> , she replies to my comment at <https://ecfsapi.fcc.gov/file/102617713456/Perens ET 17 215.pdf> .

I have limited my reply to hers to a single issue on which I have additional data, rather than opinions, to present.

2. Is The Number of Amateur Service Licensees Increasing?

In Ms. Carson's reply, page 7, she asserts that number of Amateur licensees is still increasing. The graph I used does support Ms. Carson's conclusion. Unfortunately, the news is worse. It is best shown by this graph of Amateur Radio licensing yearly growth, taken from the recent report of ARRL's entry-level license committee.



This graph is taken from the report at <http://www.arrl.org/files/file/2017%20Board%20of%20Directors/July%202017%20Reports/25%201707-ELL.pdf>

A running total of Amateur licensing is kept online by Joe Speroni AH0A. His month-to-month totals are at <http://ah0a.org/FCC/Licenses.html> . Mr. Speroni’s data shows a total growth of Amateur licensees from October 2016 to October 2017 of 3458 licensees, less than a half-percent increase year-to-year. The graph and this most recent datum do show a leveling-off of growth in Amateur licensing, with the potential for a decrease in Amateur licensing mere months from now.

This downward trend has stirred up Amateur Radio leadership. Thus, ARRL is exploring a new entry-level license, per their report referenced above, and IARU is exploring how to attract young people to Amateur Radio, as reported at <http://www.arrl.org/news/iaru-president-traditional-aspects-of-ham-radio-may-not-be-attractive-to-newcomers> .

3. Ms. Carson’s Other Comments

Regarding Ms. Carson’s other comments, we differ in opinions rather than hard data, thus I shall not engage in replies at this time.

4. Administrative Issues For This Proceeding

This proceeding is not the usual NPRM, it is only a solicitation for suggestions to FCC's Technical Advisory Council. The announcement of the proceeding and its details are at <https://ecfsapi.fcc.gov/file/08301206407338/DA-17-800A1.pdf> .

No reply comment period was specified for this proceeding. Only a comment period was specified, which closed on October 30. Thus, unfortunately Ms. Carson's reply and *this* reply are *not* timely filed.

The operators of the ECFS usually accept submissions and place them online long after the end of a proceeding. However, the TAC is not *obligated* to take notice of Ms. Carson's reply, or mine, or indeed anything submitted after the closing date, although members may choose to do so.

It may be that the TAC opens additional proceedings based on the suggestions in this one. If they don't do so within a reasonable time, I would expect to file requests for rule-making, as may other Amateurs.

Thus, there will be later comment and reply periods regarding these issues in which Ms. Carson and others may timely file.

Ms. Carson and others are invited to influence my opinions via email to bruce@perens.com .