

Charles L. Furlong
P.O. Box 289
Stockdale, Pa. 15483
September 8, 1993

Before the
Federal Communications Commission
Washington, DC 20554

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In the Matter of

FCC MAIL ROOM

Part 13, and The Communications Act
Section 303 and Section 4.
Qualifications of Radio Station Operators,
and the Authority of the F.C.C. to accept and employ
the service of persons it feels qualified to administer exams.

To the F.C.C.,

I come to you with this petition to make change(s) in Part 13, and possibly even the Communications Act itself, dealing with the qualifications and issuance of Commercial Radio Telephone/Telegraph Licenses.

First of all, my credentials which I feel allow me to come forth are that, I currently hold an Extra Class License. I am also a Volunteer Examiner and the head of a local Amateur Radio License Volunteer Examining Team. I am certified as a CVE through the W5YI Group in Texas, conducting exams on a monthly basis.

I've been involved with different facets of radio and electronics for about 20 years. I'm the Owner/Control Op of a Repeater station, maintained solely by myself. While I may not hold a degree in Electrical Engineering, I believe that my credentials as well as past experience, speak for themselves.

As you know, the Rules and Regulations were amended to allow the F.C.C. to utilize outside services in giving exams and ultimately issuing PPC's to those who qualify for a Commercial Radio Telephone/Telegraph License.

The Examiners, set up through what has become known as "COLEMS", are persons who are presently licensed as either Extra Class Licensees or the holders of a Commercial License.

Quite obviously, you feel that those of us holding Extra Class Licenses are capable and knowledgeable enough to test potential applicants for a Commercial License.

Also, those applying for a RadioTelegraph license are to be given credit for the code, if they have an Extra Class License. Reversing the role, a person with a RadioTelegraph license, is issued credit for the code portion, should they elect to take an exam for any class of Amateur license, especially 13 or 20 WPM. This is a form of "Credit Swapping", Amateur to Commercial and vice-versa.

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It's a little known fact that many of the questions in the pool for the Commercial RadioTelephone Operator License, come directly from or are the same "verbatim" as those found in the pools for the Amateur Advanced and Extra Class Licenses.

The Advanced and Extra Class License exam(s), are about as rigorous as the exam(s) for a RadioTelephone License.

Why then, couldn't the Advanced and/or the Extra Class Amateur Licensees, be given credit for their Electronics experience, and be issued a Commercial License, either directly (a minimum of a GROL) or perhaps with some minor additional testing? The additional testing being that of the necessary Rules and Regulations pertaining to the Commercial aspects and/or the Maritime aspects, as they may apply.

All other testing such as Radar Endorsement and so on, to be kept mandatory, to keep with the current set guidelines.

I believe this makes sense. If you have enough trust in us to give us the right to test people for those classes of license, obviously we are good enough to have one ourselves (at least the minimum of the GROL), given what we've already been through to earn that right.

Additional points that I would like to make are.

Most Amateurs strive to police themselves even when it comes to doing modifications to equipment, so as not to cause any interference. Lately, CBers were more or less given the go ahead, to operate on the circuitry of their radio's, providing they were not modified to operate illegally. Most of them, have very little if any Electronics background, so what are the chances of them following the laws set forth.

You have given those who apply (with no exam required) for a Restricted RadioTelephone Operator Permit (RP), the right to maintain and repair AM, FM, TV, or International Broadcast Stations, and even act as Chief Engineer. Anyone can apply, even one with absolutely no electronics experience whatsoever. How can this be justified? It is very contradictory, if thought through properly.

It is in my opinion, that we are "Qualified" Radio Operators.

I hope that you will at least consider the points that I have raised here.

I am thanking you in advance for your time, effort, and consideration, of this petition.

Sincerely,



Charles L. Furlong
KA3FLU

Enc: Original letter and nine copies