

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

93-267

In the Matter of)
Amendment to the Amateur Service)
Rules to Extend Temporary Operating)
Authority of New Amateur Operators.)

RM-8288

To: Office of the Secretary
Federal Communications Commission
Washington, D.C. 20554

PRELIMINARY COMMENTS OF
THE NATIONAL AMATEUR RADIO ASSOCIATION

January 7, 1994

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PRELIMINARY COMMENTS OF
THE NATIONAL AMATEUR RADIO ASSOCIATION

The National Amateur Radio Association (NARA) is a national organization formed in 1989 for the purpose of promoting the Amateur Radio Service with the general public and to represent the interests of beginning Amateurs, namely those holding the Novice and Technician Class license.

The organization is a 501(c)(3) non-profit corporation, and has its principal offices in Redmond, Washington, with branch offices in Arlington, Texas, and Clearwater, Florida. The membership is approximately 7,500, consisting primarily of Technician Class operators and those not yet licensed.

BACKGROUND

Based on a petition submitted June 28, 1993 by the Western Carolina Amateur Radio Society/VEC, Inc. (WESCARS), the Commission is suggesting a rule that would grant immediate temporary operating authority to persons who pass the examinations for a new Amateur operator license.

The Commission suggests that a Certificate of Successful Completion of Examination (CSCE) be the visible evidence of the applicant's operating authority until receipt of a license issued by the Federal Communication Commission.

The Commission further suggests that for purposed of over-the-air identification that these stations shall use a temporary call sign determined by the person's initials and mailing address. A unique prefix, such as WZ would identify the person as a new Amateur station awaiting a license. This would be followed by a numerical indicator based on the VEC region for the mailing address shown on the license application. The suffix used to identify the new Amateur would consist of the successful applicants initials and an indicator as required by section 97.119(e) of the Commission rules.

DISCUSSION IN FAVOR

Passing the requirements for any class of license, including the Technician Class, is an accomplishment. Newcomers no longer are primarily people from "ham families." Rather, they are tradespeople, those skilled in arts other than electronics, students, young people and females, all of whom were formerly discouraged, for one reason or another, from earning an Amateur Radio license. To these people Amateur Radio represents a mysterious new world, with a strange language and foreign concepts that must be learned before they can be granted an Amateur license. They must study and learn in order to be an Amateur and they value their accomplishment.

With few exceptions, they are relieved when they pass the test and universally frustrated that they must wait, as long as three months, for their license to arrive.

While it can be argued that the Commission's new computer, and the availability of on-line filing by VEC's, would eliminate the need for immediate temporary operating authority, this is not the case. There are still humans involved in the process and mistakes will be made which delay the issuance of the license. Further, it will always be necessary to move human resources between activities carried on by personnel at the licensing facility. It is unreasonable to assume that issuance of licenses will always flow in a smooth, timely manner.

One of the underlying purposes of RM-8288 is to minimize telephone communications and correspondence regarding the issuance of licenses, at the Commission, VEC and VE levels. The temporary operating authority proposed by this petition would virtually eliminate this problem.

DISCUSSION IN OPPOSITION

Opposition to RM-8288 is almost entirely focused on the use of the successful applicant's initials in the temporary call letters. There are both emotional and practical reasons why this is an idea whose time should never arrive.

Many Amateurs believe that concept of using the initials of the successful applicant is reminiscent of the Citizens Radio Service (CB). In the early days of CB, license holders were proud of their call letters and even exchanged QSL cards. But in the

process of deregulating this service, the Commission permitted operators to use their initials and later, to assign their own call letters and other identifiers.

Reasonable, or not, Amateurs associate the use of initials in call letters with the rampant disregard for the law that presently permeates the Citizens Radio Service. While there is no rational reason to assume the same would occur in the Amateur Radio Service, it requires too big a leap-of-faith for Amateurs.

There are other, more practical, reasons why the use of initials in the temporary operating authority call letters is not in the best interest of the Amateur Radio Service.

The most serious aspect is that of accountability. In the event that it is necessary for the Commission to contact a violator, it would be difficult at best. First, which VE granted the temporary operating authority? Once this was determined, how would the Commission contact the violator? Which session did WZ4DLS attend? Who has the records and how is the DLS suffix found when the CSCE is not filed in alphabetical order?

It is reasonable to assume that due to the shortage of human resources and the difficulty of locating the lawbreaker, the Commission might be tempted to overlook violators that, under normal circumstances, would be identified and cited.

There is also a problem of duplicate calls. Admittedly this is a minor concern but it will happen, particularly with several VE's in a given area. And when it happens, it will create extra work for the Commission, the VEC and the VEs involved.

POSITION OF THE NATIONAL AMATEUR RADIO ASSOCIATION

For the reasons stated above, NARA must oppose the petition as presented. However, as we have previously stated, this appears to be an excellent concept for the reasons discussed.

Therefore, NARA proposes a relatively simple revision to section 97.119(g) which would make the concept acceptable. Other sections of the Rules and Regulations, as provided in PR Docket 93-267, would remain unchanged. NARA recommends that:

(1) all Volunteer Examiner groups be permitted to apply for a WZ prefix call sign, either sequentially issued or under the proposed Vanity Call Sign System, as discussed in 93-305.

(2) all Volunteer Examiner groups be permitted to grant a temporary operating authority to the successful applicant and that he or she be permitted to use the call issued by the Commission to the VE group *with a numerical suffix*. The numerical suffix to their call letters would be issued in a sequential manner up to 9999 and, at that point, revert to the digit one.

(3) the VE call letters and numerical suffix be added to the "*Manifest of Applicants*," supplied by the VE to the VEC and that the form be modified to include the mailing address of the successful applicant, who is using the temporary operating authority, and call letters with numerical suffix.

(4) the VEC become the source of information, in the manifest, in the event the Commission must communicate with anyone using the temporary operating authority and call letters with numerical suffix.

DISCUSSION ON PROPOSED REVISION TO PR DOCKET 93-267

The revision, proposed by NARA, is simple to implement and requires a minimum of changes in the Commission Rules and Regulations. Further, it accomplishes the intended purpose of RM-8288, but *with the addition of accountability*. It creates virtually no extra work for the VE group, yet virtually eliminates questions regarding the issuance of call letters.

The revision, proposed by NARA, may create a slight additional increase in the workload of the VEC, but only in the instance that the Commission needs to contact someone operating under the temporary operating authority.

ADDITIONAL INFORMATION

The Commission can contact the National Amateur Radio Association office in Arlington, Texas, at 817-860-0978 (phone), 817-860-0979 (facsimile), the President, Mr. Donald L. Stoner, W6TNS, at 813-461-0393 (phone), 813-446-9634 (facsimile) or its General Counsel, Blumenfeld & Cohen, 202-955-6300 (phone), 202-955-6460 (facsimile).

Respectfully submitted,
National Amateur Radio Assoc.

By: 

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