

RECEIVED

JAN 10 1994

FCC-MAIL ROOM

Before the
Federal Communications Commission
Washington, DC 20554

In the matter of

Amending of the Amateur Service)
Rules to Extend Temporary Operating) PR Docket 93-267
Authority to New Amateur Operators)

Comments of

John M. C. Covington, III
P.O. Box 217122
Charlotte NC 28221-7122

Date: 1/7/94

Summary

I am not in favor of the current proposal to issue temporary operating authority to unlicensed individuals who pass an Amateur Radio License exam. My opposition is to the current proposal, not to the idea of temporary operating authority. I am concerned that the current proposal permits duplicate callsigns and provides no mechanism for authentication. A better proposal would be to develop a system where the VEC would assign callsigns that would become the applicant's permanent callsign once the FCC processed the license application.

Discussion

I am an Amateur Radio Operator and have been licensed for 21 years; I do not expect that this proposal will impact me directly in any way. I have recently qualified for a General Radiotelephone Operator License and therefore have some familiarity with Commercial Radiotelephone

10 copies

Operator Licensing procedures, which are referenced in my remarks.

The current proposal does not allow for any authentication of temporary callsigns; they are simply made up at the time of examination using the operator's initials. There will be no mechanism to trace these callsigns to a specific VEC or VE team, and will not be traceable to the Commission. While this kind of temporary callsign has been successfully used in the Citizens Radio Service, I submit that Amateur Radio Licensing is a completely different situation. In the case of a Class D Citizens Radio Service license, issuance of a license was a formality which simply had to be requested by application; there was almost no chance that the application would be rejected unless the applicant was a convicted felon. Using a temporary callsign would only be used to circumvent the long wait for a license.

With the Amateur Radio Service, there is a lot more at risk. Using a temporary callsign would be used to circumvent taking an examination by some. While this could be true even under the current system, callsigns can be authenticated in very short order, making it much more difficult for someone to use a temporary callsign for long without being detected. Under the proposed system, there will be no way to authenticate a temporary callsign, and someone could presumably use one forever without ever being detected.

The proposed system also does not require that these callsigns be unique. If I were to receive such operating authority, I would probably use the callsign WZ4JMC. If a (fictional) person named James Michael

Chandler were to do likewise, he would use the callsign WZ4JMC also. Since there is no guarantee of uniqueness, the self-policing nature of Amateur Radio enforcement of rules will be much more difficult; someone can always claim that the WZ4JMC station heard was someone else.

A better system would be to issue the permanent callsign at the time of examination. While I do not have the time to go into such a proposal here, there are some elements of Commercial Radio Operator licensing which could be applied here. Proof-Of-Passing Certificates used by COLEMs must have the following characteristics: they must be counterfeit-proof and they must be strictly accounted for by the COLEM.

A similar proposal for Amateur-licensing could go something like this: blocks of Amateur Station callsigns could be issued to VECs, and then counterfeit-proof station license forms could be printed and distributed from the VECs to the VE teams actually administering exams. These station licenses would have the callsigns printed on them (much like the serial numbers on PPCs used by COLEMs). Once a person qualifies for a license, the operator license and mailing address portions would be filled in by the administering VE team. These could be two-part forms, with one part to be given to the new licensee, and the other part accompanying the FCC Form 610 (or if additional paperwork would cause a heavy burden, the VEC could simply place the newly assigned callsign on the FCC Form 610 in lieu of a two-part form). The FCC then can process the application, and the permanent callsign is already assigned, unless the applicant requested a callsign change.

Conclusion

I urge the Commission to reject the current proposal, and to seek comments from the Volunteer Examiner Coordinators on the feasibility of issuing permanent callsigns, rather than temporary ones, to new licensees at the time of qualification.