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JAN 10 '94 09:58 W5YI GROUP-DALLAS TX
**NATIONAL
VOLUNTEER
EXAMINERS**

Amateur Radio Service

W5YI-VEC, INC. - A Not-For-Profit Corporation
Mail Address: P.O. Box 565101, Dallas, TX 75356



Frederick O. Maia
Coordinator
W5YI-VEC

January 10, 1993

~~Attn: The Secretary~~

FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

RE: Comments on
PR Docket No. 93-267

Attn: **William F. Caton**
Acting Secretary

VIA FAX: 1-202-653-5402

DISPATCHED BY
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FCC MAIL SECTION

Dear Mr. Caton,

Please accept our comments on PR Docket No. 93-267 - Amendment of the Amateur Service Rules to Extend Temporary Operating Authority to New Amateur Operators.

These comments are being filed by facsimile since today is the last day of the public comment period.

Thank you.

Very truly yours,
THE W5YI VEC, INC.

FREDERICK O. MAIA, W5YI
President

Enclosure: Comments, PR 93-267
(7 pages)

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632-6410

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

RECEIVED

JAN 11 1994

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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

PR Docket No. 93-267

To: The Commission

COMMENTS OF FREDERICK O. MAIA, W5YI

I: INTRODUCTION

The W5YI-VEC, Inc. files these comments in support of the Commission's proposal which would permit unlicensed amateur radio operator examinees who have passed the required examinations necessary to obtain an amateur service license to begin operating on the amateur service frequencies at once.

Mr. Maia is an Amateur Extra Class Amateur Radio Operator, first licensed in 1956. He has been active in the Commission's Volunteer-Examiner Coordinator (VEC) program since the transfer of amateur radio operator testing to the private sector in 1984. The W5YI-VEC today coordinates approximately one-third of the Amateur Radio examinations given nationwide and is in a good position to know and assess the problems associated with amateur radio license issuance.

In 1993, the W5YI-VEC coordinated approximately 4,000 examination sessions where nearly 35,000 examinees were administered some 60,000 examination elements. Due to the popularity of the Commission's Codeless Technician license class, the majority of these examinees were unlicensed when they were administered these examinations.

II: BACKGROUND

This proposal is a result of a PETITION FOR RULE MAKING¹, filed by Raymond K. Adams, N4BAQ, Vice President and Treasurer of the Western Carolina Amateur Radio Society/VEC, Inc. (Petitioner), 5833 Clinton Highway, Suite 203, Knoxville, Tennessee 37912, requesting to:

¹ Petition submitted June 28, 1993 by WCARS and assigned RM-8288.

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5. Temporary call signs are immediately available for recycling to another new amateur once the amateur's permanent primary call sign has been received by the applicant. VE's should be advised by an applicant when their FCC issued call sign arrives. This could be accomplished by a simple mail-back procedure.

6. New amateurs outside the contiguous United States would also be issued the above temporary call signs by the VE team upon completion of their examination requirements.

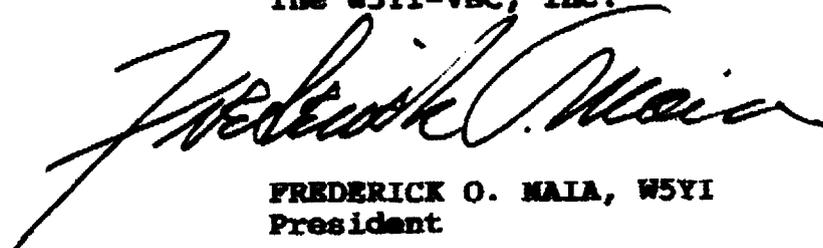
7. Anyone wishing to ascertain the origin of any temporary call sign can be referred to the VEC (determined by the prefix) who issued the suffix block. The VEC will be able to determine the issuing VE team from the suffix blocks allocated each team. VE team records, in turn, will yield the applicant's identity. Temporary station call signs are controlled by the VE/VEC community.

V. CONCLUSION

The W5YI-VEC believes that the provisions contained in PR Docket No. 93-267 fulfills a serious need in the Amateur Service. Our daily contact with amateur service applicants, VEs, VECs - and the Commission itself - indicate that everyone will benefit from this amendment and all favor its immediate adoption.

We do not completely share the pessimism of some existing amateurs who fear that temporary call signs will be abused by the public. Since this concern appears to be widespread, however, we offer an alternate system which allows the VE/VEC community to issue specific temporary call signs to examinees who qualify for Amateur Radio operator licenses.

Respectfully submitted,
The W5YI-VEC, Inc.



FREDERICK O. MAIA, W5YI
President

January 10, 1994

Submitted by: Frederick O. Maia, W5YI
President, W5YI-VEC, Inc.
President, The W5YI Group, Inc.
Vice Chairman, NCVEC Question Pool Committee
2000 E. Randol Mill Road, Suite 608A
Arlington, Texas 76012
Tel. (817) 461-6443

IV.

ALTERNATE PROPOSAL

1. A block of call signs should be issued to each VEC who in turn would issue a smaller group to each of their VE teams. Based on historic examination activity which has remained steady over the years, we suggest the following:

VEC	Prefix	Number	Suffix Letters	Combinations Per	
				District	All
ARRL	WX	1 to 9	AAA to ZZZ	17,576	175,760
WSYI	WY	1 to 9	AAA to ZZZ	17,576	175,760
Anchorage	WZ	1 to 9	AAA to AZZ	676	6,760
Central Alabama	WZ	1 to 9	BAA to CZZ	1,352	13,520
Charlotte	WZ	1 to 9	DAA to DZZ	676	6,760
Golden Empire	WZ	1 to 9	EAA to EZZ	676	6,760
Great Lakes	WZ	1 to 9	FAA to GZZ	1,352	13,520
Greater LA	WZ	1 to 9	HAA to IZZ	1,352	13,520
Jefferson	WZ	1 to 9	JAA to JZZ	676	6,760
Koolau	WZ	1 to 9	KAA to KZZ	676	6,760
Laurel	WZ	1 to 9	LAA to MZZ	1,352	1,352
Milwaukee	WZ	1 to 9	NAA to NZZ	676	6,760
Mountain	WZ	1 to 9	OAA to OZZ	676	6,760
PHD	WZ	1 to 9	PAA to PZZ	676	6,760
Sandarc	WZ	1 to 9	QAA to RZZ	1,352	13,520
Sunnyvale	WZ	1 to 9	SAA to TZZ	1,352	13,520
Triad	WZ	1 to 9	UAA to UZZ	676	6,760
W. Carolina	WZ	1 to 9	VAA to VZZ	1,352	13,520
(Reserved)	WZ	1 to 9	XAA to ZZZ	2,028	20,028

2. The proposed §97.119(g) wording should be changed to:

(g) When the station is transmitting under the authority of §97.5(d)(7), the call sign must consist of the following:

- (1) The prefix WX, WY or WZ
- (2) The numeral 1 through 9 coinciding with the mailing address given in the license application by the person
- (3) A three letter suffix assigned by the VE team. The suffixes will be taken from blocks distributed to the VE team by their VEC.
- (4) The FCC will issue public announcements detailing the policies and procedures of the temporary call sign assignment system.

3. Each VEC will be responsible for managing their allocated temporary call sign blocks.

4. Each VE team would be responsible for

(a) assigning a temporary call sign to an examinee who has completed their initial examination requirements.

(b) Managing their block of temporary call signs

3. was traveling a chaotic downhill path similar to that of the Citizens Radio Service in the 1970s. CB was ultimately de-licensed, left unsupervised and unruly communications permitted without benefit of any station call signs whatsoever. "We don't want a fence built around a ham radio pig pen," is the way one amateur put it.

4. There also were some selfish licensees who felt that if they had to wait for their operator license, in fairness - others should have to also. "The privileges are substantial and worth waiting for. They are no better than I am." This position is self-centered, without merit and deserves no further consideration.

The first three arguments, however - seem to be widespread, appear reasonable and warrant further examination.

The WSYI-VEC believes that extending temporary operating authority to newly qualified amateurs will be advantageous to the examinee, the VEC System, the FCC and the community. We do not foresee that there will be widespread abuse.

We should also consider who will be using the temporary call signs and the bands on which they will be employed.

a. Prior to 1991, 90 percent of all first time radioamateurs entered the service as Novices and were authorized telegraphy privileges on several high frequency bands and "voice" on the ten meter band.

b. Today, 80 percent (and this percentage continues to increase) of all beginners choose the Technician Class path which essentially permits local VHF/UHF communications.

Thus the potential for abuse of a temporary call sign is limited since the communications range of Technician licensees is relatively small and existing amateurs within this limited area generally are capable of quickly determining and addressing any mishandling.

However, since a good portion of the amateur community seems convinced that there

a. should be controls established on the issuance of temporary call signs. "They should be issued by someone in authority - not self-assigned."

b. should be some method of determining whether a newcomer has indeed qualified for his privileges and who issued the operating authority;

we offer the following alternate plan for the development and issuance of temporary call signs:

service) and to the FCC in terms of resources which must be diverted from other more important inquiries.

The VEs, VECs and the Commission all want to provide good service to the public and to new amateurs who wish to begin their amateur radio operation as expeditiously as possible. A system of immediate authorized radio operation for new amateurs would be in the public interest and further the Commission's stated goal of wider use of telecommunications.

Extending temporary operation to new amateurs is a "win-win" situation since it would improve VE/VEC/FCC service to the public while reducing costs. It also could provide a means in which qualified amateurs might participate faster in support of public service, emergency and disaster communications. The end result will be a happier, more productive and efficient amateur radio service, VEC System and FCC.

There are no legal obstacles to the Commission permitting immediate amateur radio operation. A precedent for temporary licensing of personal and commercial radio operators awaiting final grant of their application already exists in other radio services. Our VEC experience has been that every applicant qualified by examination for an amateur radio operator license is accepted by the Commission. As proposed by the Commission, temporary operation by known undesirable operators can be eliminated by the rule amendment.

Our informal survey of examinees, new amateurs, volunteer examiners and VECs indicates a profound majority are in favor of a system which would permit immediate amateur radio operation by qualified individuals.

A similar survey of existing amateurs not involved in the testing function did not meet with that same approval. They objected to extending temporary authority to newcomers on the basis that they believed such a procedure:

1. would cause chaos in the service since it would be impossible to determine who had actually passed the required examinations and who had not. The primary argument was that since hundreds of VE teams are coordinated by several VECs, neither the VE community - nor the FCC would have a mechanism to determine or be able to check if a newcomer using his/her initials and a common call sign prefix was indeed qualified. "Anyone would be able to go on the amateur air waves with their initials confident of not being challenged."

2. would destroy the historic individuality of amateur station call signs. Successful examinees with the same initials will have the same temporary call sign. This appears unacceptable to many amateurs.

data processing equipment and procedures. Furthermore, the implementation of electronic filing of FCC Form 610 applications by VECs will decrease the time duration that an examinee will have to wait for their license. Even so, we believe that instantaneous temporary operating authority will benefit the examinee, VEC System and the Commission. Even with electronic application filing there will still be a delay between qualifying for and receipt of an amateur radio operator license. We also anticipate that not all VECs will have the capability to participate in electronic filing.

A temporary operating procedure exists for amateurs who up-grade their license to immediately begin using their newly obtained frequencies⁵. There is no procedure at present, however, to permit the unlicensed examinee to begin using their newly earned privileges since they do not have a call sign with which to identify their station as required by the rules.

Due to the necessary delay incurred by VE processing and VEC application screening time, it can be anywhere from two to four weeks before the FCC Form 610 application is submitted to the Commission's licensing facility in Gettysburg, PA. The delay is further lengthened by Commission's lack of resources. The FCC simply does not have additional manpower needed to process the increased amateur service workload caused by the introduction of the Code-free Technician license. Thus it is not unusual for a three month period to occur between examination and receipt of an applicant's first call sign.

III.

COMMENTS

Most entry-level applicants are very eager to get on the amateur air waves as soon as possible. Beginners currently must wait several weeks until their station call sign arrives from the FCC. Their frustration mounts with every passing week and the end result is endless telephone calls to the VE team, VEC Office and the Commission's Gettysburg, PA licensing facility. This is very burdensome, time consuming and costly to everyone involved and often results in further delays since time and resources must be spent in responding to these requests rather than processing license applications.

The FCC in Gettysburg has no record of an FCC Form 610 Amateur Station/Operator application until the amateur operator license is actually issued. Applicants who are told by the FCC that they have "no record" of their application generally believe the application has yet to be filed with the Commission for license issuance. The result is more frustration ...and more telephone calls to the VE and VEC. These telephone calls are very expensive to the VEC (several of whom - the WSYI-VEC included - offer toll-free "800"

⁵ See §97.9(b) which authorizes amateurs who have filed an application for a higher grade operator license to immediately exercise the rights and privileges of the higher operator class.

a. authorize an unlicensed person who has completed the examination requirements² necessary for an amateur radio operator license within the prior year to immediately begin using the frequency privileges of this license pending receipt of the license document from the Commission.

b. Such authorization would be based on the Certificate of Successful Completion of Examination document (CSCCE) which is routinely required³ to be issued by the volunteer examiners (VEs) administering the prerequisite license examinations.

c. A self-assigned temporary station call sign would be used as station identification until such time as the Commission-issued operator license document and permanent call sign is received. This identification would consist of the prefix letters WZ followed by a geographical area numeral, the first initials of the examinee's first, middle and last name and a license class indicator⁴.

The petitioner also suggested that the Commission may wish to consider inserting wording to preclude temporary operations by any person who has ever had an FCC-issued license suspended or revoked.

This petition seeks to correct a serious difficulty in the VEC System which examines the public on criterion needed to participate in amateur service operations. Fueled by the Commission's adoption of a Morse code free operator license, the amateur service is enjoying a significant expansion at the entry level.

This has resulted in a vastly increased need for volunteer examinations and the issuance of first time amateur operator licenses. The VEC System has been able to keep up with the expanded testing demand due to the accompanying increased expense reimbursement and by adding VE teams. The FCC, on the other hand, has not been able to provide the increased personnel and budget resources necessary to issue the additional amateur service license documents in a timely fashion. The end result has been a longer waiting period for new amateur licensees to get on the air.

We recognize that the Commission is in the process of updating their amateur radio operator license issuance function with new

² The examination requirements for the various amateur radio operator licenses are contained in 47 CFR, Subpart F, Section §97.501(a) through (e).

³ See §97.511(d)

⁴ See §97.119(e). The identifiers are: KT Technician, AG General, AA Advanced and AE Amateur Extra Class. An additional identifier, KN would have to be added to identify new Novice Class operators.