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JAN 13 1991

In the Matter of PR DOCKET 93-267

FCC - MAIL ROOM

The American Radio Relay League has filed a petition on the electronic filing of amateur radio licenses at the time the appropriate test elements are passed at Volunteer Examiner Sessions.

The alternative system proposed by the FCC is both unworkable and a dangerous precedent for any radio service. Such call signs have the format WZ#ABC, where the # is the call district, and ABC represent the initials of the operator.

The FCC is proposing a system which provides instant licensing. While this will serve to have licenses issued immediately, it will in short order likely lead to total chaos and the potential destruction of the existing Amateur bands.

The licensed amateurs are able to, to a great extent, help police the amateur bands and insure proper and legal operation. With the availability of new databases, including on line databases having the latest FCC issued licensing information (Buckmaster and others), it is possible for amateurs to easily verify both the license condition and license class of any operator heard on the air. More importantly, it is possible to find out the home address and contact this amateur for one of many important reasons. This operator has, on several occasions, called other amateur operators to point out problems with operation. Usually, these problems are such that the operator with a problem is not aware of the problem. Novices and new operators are those most likely to fail to operate correctly or to have technical faults with their stations due to new equipment, new priveleges, etc.

It is imperative that Amateurs have access to the names and addresses of licensed amateurs if they are to continue their help in self policing the amateur bands. The FCC system fails totally in this regard.

The FCC proposal, which would grant self assigned call signs, with no available record of who had what call sign, where it was issued, by whom it was issued, and whether it is valid or not, is NOT WORKABLE. The FCC has proof itself from the Citizen Band where operators were supposed to use FCC call signs, but wound up making up their own "handles".

Without a means to police the amateur bands, there will be no way to keep bootleggers and others off the air. One will have no idea whether a call sign is valid. In addition, multiple people may have the exact same call sign at the same time. There will be no way to tell if a temporary call is used forever, or whether it is valid. The FCC will not be able to either track down these operators, or have legal basis to take action against these operators since it cannot guarantee that there were not multiple people having the same call sign at the same time in the same place (Not me, and prove it!).

With the availability of on-line data bases, there is absolutely no reason why the FCC should not modify its licensing proposal to ensure that there is a means for both amateurs and more importantly, for the FCC, to identify, and verify, any amateur call.

I shudder to think what might happen if , for some reason, a new novice or new "extra" licensee has a technical fault in a mobile unit, which just happens to be wiping out critical communications (such as air to ground landing frequencies). With the FCC proposal, there would be no easy way to track down whether indeed such a call was valid, and who had it. Other than mount a massive direction finding effort, which might continue for days if the problem or operation were intermittent, there would be no way

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to have this problem fixed. Even when you find one "WZ5ABC", there might be several on the air at the same time in the same city.

The ARRL has proposed a system which is acceptable to the amateur population. The FCC should seriously weigh the benefits of knowing how the valuable spectrum is being licensed (to whom), and of allowing amateurs to be able to self police the bands as they have done for over 50 years. I strongly urge the Commission to implement procedures as recommended in PR 93-267

Bob Voss N4CD  
3133 Charring Cross  
Plano, Tx 75025

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*Bob Voss*

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FCC - MAIL ROOM

December 28, 1993

In the matter of PR Docket 93-267

Secretary  
Federal Communications Commission  
Washington, DC, 20554

Dear Sirs:

I am writing you today in order to voice my concerns as a licensed Amateur Radio Operator regarding the issuance of temporary Amateur License as proposed by PR Docket 93-267. It is my opinion that if adopted by the FCC, complications could arise that would prove to be detrimental to the Amateur Radio Service in the future.

I do not believe that the current waiting period for issuance of a new license is too lengthy given the current status of the FCC staffing and the FCC's priorities. Entering a new pool of call signs into the Amateur Service as temporary call signs would only complicate the existing system as well as encourage illegal operations on the Amateur bands, and the purchasing of Amateur equipment by non-licensed individuals. It is also my opinion that tracking of the temporary call signs would be almost impossible given the resources currently available. I do not believe that VEC groups should be involved in this effort.

I feel that the FCC is providing an excellent service for those individuals seeking an Amateur License and would encourage the FCC to continue to operate as it has in the past. I would also encourage those awaiting arrival of a new license to be patient. I urge the Commission to reject the proposal PR Docket 93-267. Giving the authority to issue a new license to a non-governmental group is not the solution to the problem.

Thank You,

*Paul W. Turman*

KA5TJI  
Paul W. Turman  
47 Crest Briar CT.  
Baytown, TX. 77521

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31 Dec 93

FCC-MAIL ROOM

From: Michael S. Ratican, KA1RIX  
649 Ann Street  
Duryea, PA. 18642  
To: Secretary  
Federal Communications Commission  
Washington, DC. 20554  
Subject: THE MATTER OF PR DOCKET 93-267

1. I am an amateur operator, and a member of the American Radio Relay League (ARRL). In short, I FULLY SUPPORT THE ARRL'S POSITION ON PR DOCKET 93-267, and am surprised that the commission would even consider, let alone propose such a move.

2. By your own admission, the commission is understaffed, and underfunded. Not so long ago, you determined that a similar change was not within your authority, or in the best interest of all concerned. Now, it seems you have changed your view. One must ask why?

3. You have all the tools at your disposal, including Congressional approval, to implement a new electronic filing procedure. You have had the green light on this for over a year, and yet it remains to be implemented. Again, one must ask why? Why has the commission wasted all this time, and taxpayer money laying the groundwork for this system, and not utilized it? Why the sudden "change in heart" on your position with regards to "instant licensing"?

4. Be honest. The commission is already hurting in several areas. You don't have the staff or budget to handle your current load. Even basic enforcement of current "rules of the road" seem to challenge your current capabilities. How exactly do you propose to control these "instant licensees"? How will they be identified in case of problems, or infractions? Shall we just call in to the FCC's office in Gettysburg for this information? If the commission can't even publish a list of allowed personal business communications allowable under the new guidelines due to understaffing, then it certainly isn't staffed to handle "homebrew" licensing.

5. We in the amateur community are starting to question the commission's ability to properly govern our spectrum. The one organization that usually speaks for us is the ARRL. Our organization is on record as opposing this, and they have pointed out several flaws in your proposal. Yet, you seemingly have ignored us all. Tell me, does the Federal Government

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buyer in mind for the amateur spectrum? Was 220-222 MHz just the start of selling us out? Or, are we going the way of your beloved Citizens Band? Is that the one stellar example of your "effective management skills" when the commission is left alone to decide an issue?

6. Please don't make the same mistake again. Listen to the ARRL. They are the voice of first hand experience. The opposition they have voiced is representative of thousands of "We the People" who are directly involved. Get started on electronic filing, and let the ARRL help. We're all waiting for a change that makes sense.

A handwritten signature in black ink, appearing to read "M. S. Ratican". The signature is fluid and cursive, with a prominent initial "M" and a long, sweeping tail.

M. S. Ratican  
KA1RIX