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COMMENTS RE:  
**NPRM Docket Number 93-305**  
**In the matter of Amendment of the Amateur Service Rules**  
**to implement a Vanity Call Sign Program**

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

FROM: Stephan J. Sacco, Jr.  
(Amateur Extra Class, call sign: KC2X)  
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St. Cloud, Florida 34771

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I have in front of me a copy of PR 93-305, which I obtained via the Internet from the American Radio Relay League (ARRL).

I would like to begin by thanking the Commission for its efforts to catch up with current information technology. I am a computer programmer by trade, and have experienced first hand the revolutionary changes which have occurred in the information management industry. We will have a better, more flexible and efficient Commission, and a happier, more satisfied Amateur community ("Customers") as a result.

I applaud 93-305, and offer only a few suggestions for improvement:

- Under the Introduction, section III.6 : It would certainly be helpful for Amateurs to know at the time of their application which call signs are available. The problem will be acute, especially at first. The best possible way I believe it could be done would be to allow an Amateur to call on the telephone, and order their call sign at that time, paying with a credit card. This is no different than, say Home Shopping Club, when they have only 250 Solar Powered Toasters available to sell; the first 250 folks who want a solar powered toaster call in, and buy it. I can see a few obstacles: one is requiring the signed 610-V form. Perhaps the call sign could be held for a certain number of days, with the requirement that the 610-V be submitted to the FCC before the "sale" of the new call sign can be completed. Another small obstacle with this "Buy-By-Phone" idea is that if the Commission opens the floodgates to all licensed Amateurs at the same time, a fair number of people will be needed to staff the telephone lines, at least at first. I believe, however, that this idea addresses and negates many of the other problems which arise as part of the program. Please give it serious consideration.

If my first suggestion is not acceptable, I would suggest that the Commission at least release the available Extra calls call signs on a daily or weekly basis to the ARRL and any other interested organizations so that these lists may be obtained via the Internet, or any of the commercial BBSs, such as Compuserve, etc.

- Under 97.19.f.3: "A call sign that is vacated by the licensee is available immediately to the vanity call sign system". I understand the desire of the Commission to replenish the pool of available call signs. However, allowing an immediate reassignment of a call sign would cause

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tremendous turmoil in the Amateur community; the exchange of our "QSL" cards throughout the world would be seriously disrupted; magazine subscriptions, club memberships which "key" off of the call sign all would be harmed. The immediate reassignment of a call sign could also cause great confusion within Amateur community; it would be entirely possible for me to be using my current call sign "KC2X" today, receive my "vanity" call sign tomorrow, and hear someone from New York, who had just received my "old" call sign, signing "KC2X" the very same day! I believe that, to prevent confusion, the Commission will not allow commercial broadcast stations to pick a call sign recently used in the same listening area. The same logic should be extended to the Amateur service. Another potential problem which would be thwarted by the two year delay would be the "selling" of call signs "on the side". To wit: if someone wants my call sign very badly they might be willing to pay me money to vacate it. Since the person paying me the money would be the only person who knows it would be available, they would know 1) that they could send a request to change to my (former) call sign, and 2) they would know when to make this request. I do not enjoy considering the "dark side" of human traits, but this one is so open for abuse that it is just bound to happen without a required "down time" for a retired call sign.

- The Proposal suggests \$7 per year for a "vanity" call sign. I probably should not suggest this, but that price is a bit on the low side. I would be willing to pay \$10, or perhaps even \$20 per year for a call sign I liked very much.

- Under 97.19.g.1: "The applicant must request that the call sign be canceled and provide a list of up to 10 call signs in order of preference...." If the Commission adopts my first suggestion, to allow an Amateur to call in, the Amateur themselves could /should have a list of potential call signs, and could run down the list with the "operator" on the telephone. If the phone-in idea is rejected, however, why limit the selection to just ten? Given current technology, you should allow a list as long as the applicant wants it to be. After all, the expense of receiving and handling the application has already been incurred by the Commission. Why allow only a short list (which is more likely to have no matches) and force both the Amateur (the Customer) and the Commission to incur the expense and frustration all over again? I would say that "wild card" characters should also be allowed: if I wanted a 1X2 call sign, which started with an "N", and "X" as the first letter of the suffix, I should be able to put on my application: "N4X\*", or "N4X%". This is extremely easy to do with today's technology.

- Other items I ask you to consider include the following:

- To increase the incentive to upgrade their license class, and thus hopefully increase their technical skills as well, I would suggest limiting the "vanity" program to holders of Amateur Extra class licenses. The Commission already rewards upgrades with the option of switching to a shorter call sign. Let's save the greatest "perk" for the greatest achievement.

- I believe there had been some discussion of allowing people to "reserve" and "retire" call signs. Although I saw no trace of that

thinking in 93-305, I request as strongly as possible that idea not be made any part of the program.

- Restrict the issuance of "vanity" call signs to citizens of the United States only.

- Consider some kind of orderly introduction of the program. As you are no doubt aware, the "vanity" program is one which Amateurs have wanted badly since it was taken away in the mid 1970's. (I still regret that I hadn't become an Amateur *just a few years earlier*, so that I could have picked my own call sign.)

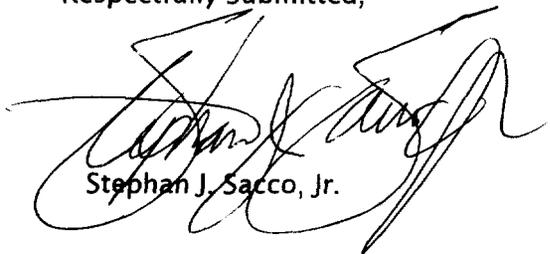
I am concerned that, without some type of phased-in approach, both the Commission's employees and the Amateur community will become extremely frustrated and overwhelmed by the initial demand. This is a sensitive subject; it is hard to suggest criteria which I *wouldn't* qualify for, and people accuse you of being self-serving if you suggest something which you *do* qualify for. I might suggest something along the lines of the following: At first only Extra class Amateurs licensed more than ten years would be eligible for a "vanity" call sign. After, allow Extra class operators licensed five or more years. Six months later, expand it to its final phase: ALL Extra class Amateurs.

- Require that only "vanity" call signs which are appropriate for that district be issued for that district (i.e.: living in Florida, I would only be allowed to select call signs from the 4th district). I suspect that this might be what the Commission was considering anyway, but I could not find anywhere in the Proposal where this was stated.

- Not require that an Amateur change to a call sign which falls within a block they are eligible for - in other words if an Amateur has a 2X3 type of call sign, and has an Extra class license they should not be compelled to change. I understand that this was not in 93-305; I just would like to make certain my opinion was known in case the Commission was considering adopting this provision as a part of a revision to 93-305.

This discourse has already become too long. The above are my comments and suggestions. I look forward to reviewing the revisions the Commission makes to 93-305, and hope that this letter has been of some use.

Respectfully Submitted,



Stephan J. Sacco, Jr.