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Office of the Secretary
Federal Communications Commission
Washington, DC 20554

FEB 15 11 cc: All Commissioners

FCC MAIL ROOM February 7, 1994

Dear Commissioners:

Ref: Docket 93-305
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I wish to respond within the public comment period specifically to Section 6 of the above-referenced Docket: access to information regarding potentially available call signs for the Vanity Call Sign program.

BACKGROUND:

In footnote 9 of the Docket you refer to Vice President Al Gore and his emphasis on customer service — a very important goal. Vice President Gore was in our neighborhood (at Monte Vista High School, Cupertino, CA) two weeks ago, and he met with the "Internet" class there. Two of the Boy Scouts in my Troop who are also licensed amateurs (Rajeev Goel, KD6MXV, and Amar Goel, KD6NFE) were there, and Amar interviewed Gore. The Vice President made the point that all parts of our government and our society need to actively anticipate the high degree of access planned for the Information Superhighway, of which the Internet is the first incarnation. The government must be an active participant and proponent.

This position by the Vice President is the basis for my comments on Section 6, as follows:

1. It is important that potential requestors be able to pre-select vacant call signs — as you note, "so that they can make prudent selections ... with a real possibility that their requests can be granted." You state that you "do not currently envision on-line access by the public to check for call sign availability." This phrase may have been in anticipation of a phone-in method whereby individuals could call or FAX the staff and determine availability. I strongly advocate a change in approach, based on standard tools that exist now on Internet-accessible computer systems. As you state in Section 3, "Information-age technology is providing the capability to administer" advanced services, and I suggest that the FCC participate in this new technology, as advocated by Vice President Gore.

2. I specifically request planning and implementation of an access system, as follows:

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- Set up Internet access to a 'snapshot' of the currently assigned call signs and the expiration date of each. This extract database would have only a few of the fields from the master database, and should be quite compact. It could be updated on-line, or it could be updated weekly.
- The requestor, using standard Internet messaging services (on CompuServe, America On-Line, Delphi, and other providers, or through the Packet Radio gateway) sends a message to a pre-assigned address at your TCP/IP (Internet) node
(example: TO: callsigns@fcc.gov).
- The requestor places callsigns of interest to him/her in the first 10 (or fewer) lines of the message area (see example, below).
- The FCC's Internet-accessable computer receives this message; from the address in the message (callsigns@fcc.gov) it knows to parse up to the first 10 message lines, check the database, append an AVAILABLE (with the last expiration date, if the call sign had previously been assigned), or an ASSIGNED suffix to each line, and return a message to the requestor with this information (for assigned calls, it may also return the expiration date). For example:

| | |
|-------|---|
| N4RX | ASSIGNED (exp. 3/6/02) |
| N4PT | AVAILABLE (last exp. 2/7/81) |
| N4ST | AVAILABLE (last exp. 8/12/75) |
| W4RX | ASSIGNED (exp. 11/5/97) |
| W4MM | ASSIGNED (exp. 7/22/98) |
| AA4MM | AVAILABLE (from available new call signs) |

etc....

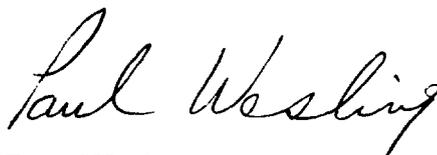
- Within a matter of minutes (or, at most, hours), the requestor knows which of the call signs of interest are available; he/she fills out the Form 610-V and sends it in with the required payment, knowing that the one call sign desired can be assigned by the FCC. This fulfills your stated desire to let the requestor "... know which call signs are assigned at the time that they file their applications so that they can make prudent selections of call signs with a real possibility that their requests can be granted" (Section 6) — and it took no involvement of the FCC's staff.
- When the requestor actually sends in the Form 610-V, it is likely to contain only one requested call sign — and that one is almost certain to be an available one. This saves staff time and effort: it is necessary to read only one Call Sign from the Form 610-V, rather than "up to ten", and then to type them into the terminal. There is also a resultant extremely high level of satisfaction from the customer, since the exact call sign wanted is the one the FCC is, in fact, able to assign.
- Of course, interested amateur licensees without Internet access can default to the standard "paper" method specified in the Docket, or as adopted by the Commission. The Internet access simply allows screening by those amateur licensees with Internet access, which is a high and growing number.
- There is the additional possibility that amateur licensees, once they have preselected an available call sign, could be allowed by the FCC to use the Internet to request a 10-day "hold" on one of the available call

signs; the FCC would reserve that call sign pending receipt of the Form 610-V with the payment, as an extra step toward customer satisfaction. Should the amateur not submit the payment and Form, the call sign reservation would automatically expire.

3. The amateur radio population, because of its technical and computer sophistication and its long history of digital mode development (eg, packet), has a higher proportion of individuals with Internet access, and the number of Internet users is growing at a rate of 10% PER MONTH (over 1000 computers are added each day). And amateurs have a gateway from our Packet Radio system into the Internet. Using the above-proposed screening method, amateurs (perhaps with assistance from other amateurs) can pre-select the available call sign of choice. In addition, this method should generate more business (and revenue) at lower staff cost than the system envisioned in the Notice of Proposed Rule Making, in that there is a high degree of uncertainty in the method proposed (submitting up to 10 requested call signs, not knowing a current status on them; needing to have staff enter each one manually into the terminal; etc). With an Internet-accessible snapshot of the call signs, however, the amateur knows which are available and is therefore a more likely customer, willing to make the transaction by sending in the Form and payment.
4. Our amateur radio organization, the American Radio Relay League, is already Internet-accessible, with the address <recipient>@arrl.org. Again, the radio community is leading the way toward the Information Superhighway profiled by Vice President Gore.

I thank you for your consideration of this proposal, and I ask that your staff report on the feasibility of its being implemented by enabling an Internet port at the same time that your new computer equipment is brought on-line; it is this initial period in which the level of interest will be greatest among amateurs, and when the benefits of such an inquiry system would be most directly appreciated by the FCC staff and the amateur radio community.

Sincerely,



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Brad Wyatt, Division Director, ARRL (0005016932@mcimail.com)

APPENDIX:

Basic and Advanced features to implement:

- Within the Internet, there is an electronic messaging system common to all Internet nodes which allows messages to be sent to users; to send messages to users at the FCC, for example, the message would be addressed: <recipient>@fcc.gov. The FCC Internet node can also be set up to watch for certain 'non-person' recipients (eg, a recipient with the name 'info.callsigns') which trigger the automatic return of a file to the requestor. Thus, a requestor can send a null-message (empty message) to such a specific address and the FCC computer will return a file or message to the requestor, which can then be read by the requestor.
- Using this technique, there could be a file containing the instructions on how to request the screening of up to 10 desired call signs, the format to be used, and the correct Internet address.
- The requestor sends a null-message to this specific address (eg: TO: info.callsigns@fcc.gov), and the FCC's computer returns the file of instructions.
- There is also a 'non-person' recipient that, when it receives a message addressed to callsigns@fcc.gov, will perform the function outlined in Section 2, above. When the message is received, the FCC's computer runs a program that checks the Call Signs in the message against either the master FCC database, or against a reduced-field copy of the database that is placed periodically (eg, weekly) in the Internet-accessible computing system.
- As another service that should be considered during this study, the staff should investigate this proposal: Within the Internet, there is a File Transfer Protocol (known as Anonymous FTP) whereby a requestor can log onto a remote computer as a guest, to retrieve information files. Individuals familiar with the Internet use this method to retrieve information from the Library of Congress (as Vice President Gore witnessed in his visit to Monte Vista High School); from the National Institute of Standards and Technology (NIST: @nist.gov), part of the Department of Commerce; from the State of Texas; and from the City of Palo Alto, CA (among other government entities); and from universities and other Internet participants. The FCC can place information files into this public space on the Internet-accessible computing system to answer the "most frequently asked questions" that are usually directed to FCC staff. As these information files circulate within the Amateur Radio community, there should be fewer interruptions of staff for routine procedures and information. In addition, the Part 97 rules, pending Dockets, and other documents can be placed in this Internet-accessible portion of the computing system. (For example: this Docket could have been available by sending a message to docket.93-305@fcc.gov, or by retrieving the file from the FCC computer using FTP).
- Should the FCC Commissioners set up an Internet address for replies to Dockets, respondents could send comments via electronic mail, reducing the incoming postal deliveries and eliminating paper copies of submissions. These electronic 'copies' can be pasted directly into word-processing programs without re-typing, another time-saver for the staff when specific comments are to be included in a record of hearings and reviews.

Suggested for further reading: Navigating the Internet, Mark Gibbs & Richard Smith, SAMS Publishing (1993).