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March 7, 1994
Office of the Secretary
Federal Communications Commission
Washington, DC 20554

In the matter of NPRM 93-305.

To the Commissioners:

In general I am in support of the potential opportunity available through this proposed rule making. I wish to present three specific recommendations concerning the organization and implementation of the "Vanity Call Sign system". The comments are as follows:

1. I would recommend at the initial phase in of the program as discussed under Item 5 of the proposal that an initial set of filing categories should be promulgated by the Commission. The suggested categories are in order of priority for applications. In other words, category 1 below would be given first priority and within a given time frame set by the Commission, no applications other than those fitting category 1 would be accepted. An initial time frame would be set by the Commission for those in each category.

1. Family members holding amateur licenses and wishing to apply for calls of deceased family members or amateurs who held previous call signs.

2. Amateurs holding the Amateur Extra Class.

3. Amateurs holding the Amateur Advanced class.

4. Amateurs holding the Amateur General Class.

5. Amateurs holding the Amateur Technician or Novice Class.

6. Club or military recreation stations once holding a call but call now lapsed. (Claimant would have to provide documentation of fact that organization once held call.)

7. Club or military recreation stations applying for the first time for a call.

A trustee of a club or military recreation station call would also be eligible for their own vanity call if they so chose. In other words, the fact that an amateur was a trustee of a Club or military recreation station would not preclude them from applying for their own personal vanity call as well.

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In addition to accepting paper applications for vanity calls, the Commission might also consider the use of E-mail type applications through the use of commercial data services or the Internet. Such applications could be filed with little or no human intervention once the FCC computer was programmed to accept such mail. The filing of applications via telephone modem would be another possibility. Although the Commission has no plans as referred to in Item 6 to make the data base available to the public, an on line application process could be instigated. Finally, electronic media such as microcomputer disks could be used but the format of the data presented would have to be clearly defined in order for it to be compatible with the Commissions system lest it require more staff time to prepare the disks after they are received than if the information was input by hand from a written application.

2. In reference to Item 6. The Commission could make new monthly updates to its database available to entrepreneurs and membership organization at cost. In turn these organizations could place them "on line" so to speak for the use of their customers or members. Those not having computer access could pay a small fee for call searches or request such searches from their respective member organization. This data could be placed on national computer networks for downloading or distribution to local computer land line bulletin board systems or on packet bulletin board systems.

3. With respect to items discussed in Item 7 of the proposal. Methods of electronic data transmission as discussed in number 2 above could be considered by the Commission. Either telephone modem or e mail type transactions would require little intervention on the part of the Commission staff, particularly if precautions were taken with respect to system security and ease of use by customers. License modifications or renewals not involving upgrading of class of license might be a beginning point for such transactions. In any case, I urge the Commission to initiate some type of electronic filing for licenses, particularly for first time licensees, as soon as possible. Such electronic filing should be a priority of the Commission as far as amateur licensing is concerned.

Submitted by:

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