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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

APR 21 1994

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In the Matter of

Amendment of the Amateur Service
Rules to Implement a Vanity
Call Sign System

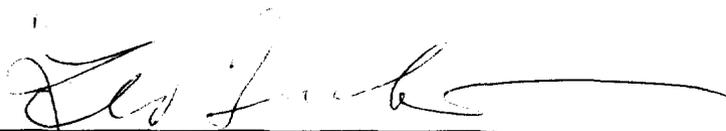
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PR Docket No. 93-305

TO: The Commission

COMMENTS OF LEO ZUCKER, K2LZ

Respectfully submitted,



Leo Zucker, K2LZ
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April 20, 1994

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COMMENTS OF LEO ZUCKER, K2LZ

Pursuant to Section 1.415(a) of the FCC's Rules, Leo Zucker, K2LZ, submits the following comments in the above-captioned proceeding and in response to the Notice of Proposed Rule Making released December 29, 1993 (NPRM).

I. My Interest in this Proceeding

1. I was first licensed by the Commission on November 8, 1957, as a Novice Class Amateur Radio Operator. My assigned Station Call Sign was **KN2HGR**. I upgraded to the General Class Operator license on May 12, 1958, at which time my call sign became **K2HGR**. On June 29, 1965, I passed an examination at the Commission's field office in New York City for the Amateur Extra Class Operator license, and I continued to use the K2HGR call sign as an Extra Class Operator through 1977. Once becoming eligible as an Amateur Extra Class licensee to apply for an unassigned "preferred" two-letter call sign, I requested an "LZ" call to match my initials. My present call sign **K2LZ** was issued by the Commission on June 28, 1977, and my Amateur Operator/Station license has since been renewed regularly. I therefore respectfully request that the Commission take the following comments into account when promulgating new rules under the present docket.

II. The Commission Should Impose Certain Restrictions on Eligibility for a Vanity Call Sign

2. The NPRM recognizes an "ardent desire" of amateur operators to acquire call signs of their choice.¹ Having been foreclosed from charging fees relating to the Amateur Radio Service since 1977, the Commission may view the recent legislation² as an opportunity to recoup its costs toward administering the Amateur Service.³ In the NPRM, the Commission allows licensees in all operator classes to apply for a vanity call sign upon completing FCC Form 610-V and paying a \$ 70 fee.⁴ I respectfully submit that because they are so desireable, vanity call signs should be available only to Extra and Advanced Class licensees. Such a limitation would act as an incentive for General and lower class licensees to upgrade, just as the availability of unassigned "preferred" call signs once worked as an incentive for amateurs to gain experience and upgrade to Extra Class.

¹NPRM, par. 1.

²47 U.S.C. § 159(f)(1) & (g). See NPRM, par. 5, n. 7.

³But see 47 U.S.C. § 159(h) which states that charges established under this section shall not be applicable to amateur radio operator licenses under Part 97.

⁴Proposed rule § 97.19.

III.

Present Holders of Specially Issued Call Signs Should Not be Subject to a Vanity Call Sign Fee Upon Renewal

3. Proposed rules §§ 97.19(c) and 97.21(a)(1) state that renewal of a call sign assigned under the vanity call sign system is to be made on Form 610-V. Inasmuch as current holders of preferred or other special call signs received their call signs under a system other than the one now being implemented, it would be improper to charge those holders a \$ 70 vanity call sign fee upon renewal of their station licenses. Accordingly, the new rules should expressly exempt holders of call signs specially issued under prior rules, from a vanity call sign fee at renewal.

IV. Conclusion

4. Due consideration by the Commission of the foregoing comments is respectfully requested.