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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FCC MAIL ROOM

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

PR Docket No. 93-305

COMMENTS OF TIMOTHY B. TOTTEN, KJ4VH

I am pleased to submit the following comments regarding the Notice of Proposed Rule Making ("NPRM") in the above captioned proceeding.¹ First licensed in 1976, and currently holding an Amateur Extra class license, I am involved in many aspects of the Amateur Service. I am an active member of several regional and national Amateur Radio organizations--including the American Radio Relay League ("ARRL")--and am the current president of the Kentucky Contest Group ("KCG").²

I strongly support the general concept and principles of the vanity call sign system as proposed in the NPRM, and congratulate the Commission for adopting it. My comments are intended to ensure that the implemented system will achieve the stated goals; namely, that it "satisfy the desires of persons in the amateur community who want to choose their own call signs...(and) be practicable to administer and simple for the amateur community to use."³ These comments are my personal opinions, and do not

necessarily represent the views of the ARRL, KCG, or any other organization.

I. IMPLEMENTATION

Anecdotal evidence suggests that the vanity call sign system will be very popular, particularly during the initial implementation period. Therefore, to reduce the risk of major backlogs in the processing of applications, I suggest that the system be implemented in phases:

Phase I - Persons requesting a call sign which they had previously held or which was previously held by an immediate family member

Phase II - All Amateur Extra class licensees

Phase III - All Advanced class licensees

Phase IV - All General class licensees

Phase V - All Technician and Novice class licensees

The duration of each phase should be sufficiently long so as to allow the bulk of initial applications to be processed, and the starting date for each phase should be announced at least thirty days in advance. Applications may be submitted at any time subsequent to the starting date for which the applicant is eligible (e.g., an Advanced class licensee may apply for a vanity call sign during Phase III or any time thereafter). Applications for club station vanity call signs may be submitted at any time

appropriate for the trustee's license class, or during Phase I if requesting a call sign which the club had previously held.

II. ELIGIBILITY FOR CALL SIGNS

As the Commission has noted, "amateur operators have a very high regard for call signs."⁴ In my opinion, this is due in part to the fact that in many cases, the call sign conveys some degree of information about the licensee, such as license class, number of years licensed, or general location. For example, many licensees are justifiably proud to have a call sign which indicates that they hold an Amateur Extra class license, or that they have been licensed for many years.

I strongly support the Commission's proposal that applicants only be eligible to choose call signs corresponding to their license class, or a lower class. However, I further propose that call signs from Block 1 and Block 3 of Group C (that is, call signs KOAAA through K9ZZZ, and W0AAA through W9ZZZ) be assignable only to amateurs who have been licensed for at least twenty years, and who currently hold at least a General class or higher license. Similarly, I believe the Commission should continue the practice of only issuing call signs containing the number appropriate for the licensee's address. These two measures are intended to preserve long-standing traditions associated with amateur call signs in the United States.

III. AVAILABILITY OF CALL SIGNS

In its proposed revision of section 97.19, the Commission allows the call sign of a deceased licensee to be made available to the vanity call sign system two years following the licensee's death. Unfortunately, this provision could result in a significant invasion of privacy from potential applicants attempting to determine if the current holder of a particular call sign is still living. I suggest that the call sign of a deceased licensee not be made available to the vanity call sign system until two years following the expiration of the license, with the exception that an immediate family member (holding an appropriate license class) could apply for the call sign as early as thirty days following the licensee's death.

Similarly, I suggest that any call sign which is vacated should not be available for reassignment for a period of two years. This would reduce the potential for misdirected QSL cards and similar problems.

IV. ACCESS TO INFORMATION REGARDING CALL SIGN AVAILABILITY

In response to the Commission's request for comments on the subject, I suggest that information regarding available call signs be made accessible via the Internet. This could be done either on the "fcc.gov" site, or through a third party's facilities. In either case, the database should be updated at least weekly.

There are several methods for making the data available on the Internet, but I suggest an "electronic mail call sign server" since Internet email is now available through most popular on-line services, and is accessible from anywhere in the country at moderate cost. With the proposed system, the user would simply send an electronic message containing a list of call signs to the appropriate address, where the list would be automatically processed.

A reply message would automatically be sent to the user indicating the availability of each call sign in the list. For each call sign which is available, the applicant's required license class should be indicated; for each call sign which is already assigned, the license expiration date should be given; finally, any call sign which is not already issued, but which is otherwise unassignable should be so indicated.⁵

I also suggest that the Commission should consider accepting FCC Form 610-V in the form of an ASCII file submitted electronically via either the Internet or dial-up connection to a bulletin board system. Such electronic submissions have the potential to reduce both Commission workload and costs. Some means of security must be provided, however, to reduce the risk of fraudulent applications.

V. FEES

Because there are no additional recurring costs associated with the proposed vanity call sign system, the entire fee for choosing a vanity call sign should be collected at the time the new call sign is issued. This also would clearly reduce the Commission's costs associated with processing payments compared to an annual fee. Also, if none of the call signs on the applicant's list of choices are available, the Commission should return the applicant's payment when reassigning his or her previous call sign.

VI. NUMBER OF REQUESTED CALL SIGNS PER APPLICATION

I believe the maximum number of requested call signs an applicant may include on his or her FCC Form 610-V should be increased to at least twenty. This would reduce the workload associated with handling a second request from an applicant whose first ten choices were unavailable. Of course, an applicant could still choose to include less than twenty call sign choices on the form if he or she wished.

VII. INITIAL CALL SIGN ASSIGNMENT

Because it would reduce the Commission's workload, and eliminate the "wasting" of call signs, I propose that applicants for a new amateur service license be allowed to participate in the vanity call sign system at the time of their original

application. This could be accomplished by submitting both FCC Forms 610 and 610-V together. Then, only if none of the applicant's call sign choices are available should a call sign be issued from the sequential call sign system.

Respectfully submitted,



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¹ Notice of Proposed Rule Making, PR Docket No. 93-305 (released 29 December, 1993).

² The Kentucky Contest Group has a membership of more than fifty active amateur radio operators, and is dedicated to the promotion of international goodwill, the development of proficient operating skills, and the advancement of the radio art through amateur radio contesting.

³ Paragraph 8, Notice of Proposed Rule Making, PR Docket No. 93-305 (released 29 December, 1993).

⁴ Paragraph 2, Notice of Proposed Rule Making, PR Docket No. 93-305 (released 29 December, 1993).

⁵ Examples of unassignable call signs might include KL4A; WP8T; call signs from the blocks AA0AAA through AL9ZZZ and NA0AAA through NZ9ZZZ; and any call sign which the Commission considers to be offensive.