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QUARTER CENTURY WIRELESS ASSOCIATION, INC.

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April 21, 1994

COMMENTS OF THE QUARTER CENTURY WIRELESS ASSOCIATION ON NOTICE OF PROPOSED
RULE MAKING IN THE MATTER OF AMENDMENT OF THE AMATEUR SERVICE RULES TO
IMPLEMENT A VANITY CALL SIGN SYSTEM.

The Quarter Century Wireless Association (QCWA), founded in 1947, comprises more than ten thousand active amateurs. To be eligible for membership, an amateur must have received his first amateur license at least twenty five years prior to his date of application. Thus, the total experience of our members aggregates many thousands of years.

The purposes of QCWA are to operate exclusively for charitable, educational and scientific purposes (entitling the Association to exemption under the provisions of Section 501(c)(3) of the Internal Revenue Code of 1954, as amended); and more specifically to promote interest in Amateur Radio communications and the advancement of the electronic art, making use of the reservoir of knowledge and experience represented within the membership of QCWA for the benefit of all Radio Amateurs and the furtherance of the Public Welfare through Amateur Radio communications; and to provide a scholarship fund for worthy students who are Radio Amateurs.

QCWA is primarily concerned about the many Amateur Radio licensees who were required to surrender their old call signs when they moved to another call area, per the

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Commission's rules at that time. However, when this was no longer a requirement, there was no vehicle for reobtaining the lost call because the Commission was now systematically issuing callsigns. When this point was discussed with Commission personnel several years ago, there was very little sympathy shown for those who had lost their identity, if you will, by the prior action. In fact, the comment was made that Radio Amateurs have an obsession with call signs!

Yes, there is a binding relationship for many with call letters they have been assigned through the years. Many of those who "lost" the earlier call would be extremely happy to have the old call back. Undoubtedly, there are others who have been content with the luck of the draw when the required change was put into effect. It is for the former group that the QCWA is requesting special consideration under the new "Vanity Call" system, as the only avenue which can achieve the results desired . . . reobtaining that call which was once taken away.

The QCWA recommendation leaves the burden of proof of prior holding of a call to the applicant. Perhaps the Commission would accept a listing in the callbook or other representative source. Perhaps the Commission would require a copy of the former license as the only legitimate proof. While this may be a difficult requirement, it is understood that it may be the only legal manner in which proof of prior holding of the call can be provided. The QCWA also understands that there may be a few cases where a call may have been reissued after it was lost due to relocation. In such circumstances, there is no intent that the present holder of that call should "give it up!"

Another consideration is that the Commission permit a prior holder applying under this provision, if approved, to hold a call which is presently considered an Extra Class or Advanced Class identification. This should not present too much difficulty since there are many hundreds, perhaps thousands, of licensees on the air today with call signs not matching their license class.

Of additional concern to QCWA is a point which is probably of concern primarily to older QCWA members, or other senior citizens of Amateur Radio. QCWA membership includes a few amateurs who received their first license prior to 1922, and a substantial number whose tenure dates back to the late 1920s and early 1930s, and it is in the interest of these pioneers in our hobby that we submit these additional comments.

Changes in licensing procedures for radio amateurs; changes in record keeping concerning call letter assignments, particularly prior to World War II; and the transition from manual to automated (computerized) record keeping, have obscured the "paper trail" of many early call letter assignments.

QCWA membership by its very nature includes amateurs who received their initial call letter assignments when the rules were different, and when there were many opportunities for one-by-two and one-by-three calls to be assigned. The proposed rules allow for such calls to be recovered by the original holder. However, the proposed rule, that the applicant can seek only call signs from the groups corresponding to their present license class or lower license classes, would inhibit the process for a certain few.

For example, consider the situation of an amateur whose original call was a one-by-two call, W9XX, whose license subsequently lapsed, who received another call sign upon requalifying, and who presently holds an Advanced class license. Our interpretation of the proposed rules indicates that this individual cannot regain his original one-by-two call.

To allow for the above two circumstances, we propose that the Commission consider a one-time-only "window" for a short period, e.g., 90 days, at the onset of the new rules, during which an applicant, such as those described previously, could regain his original call, if available, under the conditions QCWA has put forth in these comments.

QCWA appreciates that a major objective of the proposed rule changes is to allow already-licensed amateurs to recover a call sign which they held in the past; or to obtain a preferred call sign, subject to the provisions set forth in the NPRM. This flexibility is highly desirable, and has been awaited by the amateur fraternity for years. Now it is about to become a reality. We appreciate that the road to this proposed action has been a long and difficult one, and we join others in thanking the Commission for pursuing and achieving this objective despite the obstacles.

The QCWA is not in a position to suggest how the provisions that we have suggested might be implemented, since we are not conversant with the configuration and programming of the new computer facility. However, we stand ready to provide any assistance which might be required in clarifying this proposal and discussing practical implementation thereof.

for John J. Kelleher
Harry J. Dannals, W2HD,
President, QCWA