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BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

APR 25 1994

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In the matter of )  
Amendment of the Amateur Service Rules ) PR Docket No. 93-305  
to Implement a Vanity Call Sign System )

## COMMENTS ON VANITY CALL SIGN NPRM

To: The Commission

The proposed Vanity Call Sign System makes no provision with respect to the number of years the applicant has held an amateur radio license. Provision should be made, especially in the case of holders of the Extra Class license, to make 1X2 call signs (e.g. W1AB) available on a seniority basis. The Commission established a precedent under similar circumstances when, in the mid 1970's, 1X2 call signs were made available to Extra Class amateurs based on seniority. One form of implementation would be to make Vanity Call Signs available only to Amateur Extras with 20 years (or more) for a six month period, followed by 10 years for the next 6 months, and then all licensed amateurs. Clearly, many such arrangements are possible.

The Commission has an ongoing concern with respect to cost of execution of the Vanity Call Sign System. The question of cost of verification of seniority will be raised. Please consider:

- 1) A significant fee is proposed for the Vanity System. The collection of this fee will off-set the costs incurred.
- 2) The fee could be adjusted to cover additional costs.
- 3) The commission accomplished the verification of seniority during the 1970's without the high fee now being considered, and with far less cost effective computers available.

A related issue is that of providing the amateur community access to the available list of call signs. The NPRM states that on-line public access is not available at this time. One possible method of addressing this issue is as follows: Four months before beginning acceptance of Vanity Call Sign applications, make the list available to the VEC's. The ARRL, W5YI, etc. can then manage access and distribution of the list. A block of calls to service applications during the four month period can be withheld from the list.

The ownership of 1X2 call signs as an expression of dignity, seniority and respect is well established in the amateur fraternity. Seniority as a basis for issuing these signs has been previously recognized by the Commission, and should likewise be included in this new implementation.

Very truly yours,

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