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May 2, 1995

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The Secretary, FCC
Washington DC 20554

RM-8626

Gentlemen:

I have been a licensed radio amateur since 1976, with station license WA2IWW. I am a member of the American Radio Relay League (ARRL), the Albany Amateur Radio Association (AARA), the Troy (NY) Amateur Radio Association (TARA), and the Amateur Radio Satellite Corporation (AMSAT). I am also a member of Albany County RACES and Rensselaer County RACES.

I have held a variety of radio telephone operator licenses and endorsements. I was previously employed as a radio operator by commercial AM and FM radio stations in upstate New York's Capital District Area. I am currently employed as a Data Communications Specialist I by the New York State Workers' Compensation Board.

I am writing in opposition to petition RM-8626.

Service Provided

The amateur radio bulletin stations provide a valuable service to the Amateur Radio community and (indirectly), to the general public. The regular, scheduled operation of bulletin stations allows amateur radio operators to become aware of the existence of the bulletins, and to become familiar with the bulletin stations, their schedules, their frequencies and modes, and with the propagation conditions affecting bulletin transmission and reception.

Need for Regular Operation

Although most of the bulletins are of a non-emergency nature, it would be unreasonable to restrict the activities of the stations to actual emergencies only. The regular transmissions of these stations provide valuable operating experience and information for the operators of the stations, as well as for the amateur radio stations which monitor the bulletins.

The bulletin stations also provide information about the amateur radio hobby to Short Wave Listeners (SWLs). These bulletins serve to bring new persons into the hobby by stimulating their interest, and by providing information which assists in preparation for the required licensing exams.

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The present restriction that bulletin content be of interest to amateur radio operators is reasonable and appropriate, and should be retained.

Practice, practice, practice

The need for constant practice through regularly scheduled transmissions is similar to that of emergency net stations (which conduct periodic drills) and stations in the National Traffic System (NTS). While most NTS traffic consists of non-commercial, personal greetings and messages, the regular meetings of the NTS nets allow operators to acquire and sharpen skills in traffic handling and operating. As with the bulletin services, the emergency net drills and the regular NTS nets provide operators with the opportunity to become familiar with traffic nets, schedules, frequencies and modes, operating techniques, and propagation conditions.

Historical Role

The bulletin stations have served the national interest well in actual emergencies. On December 7, 1941, The Federal Communications Commission suspended the U.S. amateur radio service after the bombing of Pearl Harbor. At that time, ARRL station W1AW was allowed to remain on the air (at least for a while) to monitor the amateur bands, answer calls from U.S. amateurs, and inform them of the FCC action.

More recently, after the April 19, 1995 bombing of the Alfred P. Murrah Federal Building in Oklahoma City, there were some accounts circulating in the amateur bands regarding the declaration of a communications emergency. Certain frequencies and modes had reportedly been designated for health and welfare traffic related to the emergency. Many operators had heard something about the communications emergency, but were not sure if the information was official, and were unable to confirm it. The existence of regular, authoritative sources for emergency bulletins enhances the process by which amateur radio operators may learn about the existence of (and the restrictions of) such communications emergencies.

Other Methods Unsuitable

The petitioner has stated that information bulletins about the Amateur Radio service are available on various on-line services. Although this is true, this does not provide a reasonable justification for the discontinuance of HF bulletin stations.

Not every ham (or potential ham) has access to a computer. A recent informal poll taken at a meeting of the Albany Amateur Radio Association (AARA) indicated that only half of those in attendance had access to a computer. Since hams will tend to be more technically-inclined than most groups, this suggests that less than half of the general population will have access to a computer.

In addition, not all individuals who do have computer access have modems, direct Internet connections, or subscriptions to on-line services. Many cannot afford the expense. The bulletin station transmissions are available at no charge to anyone with access to a short-wave receiver.

VHF-only packet and voice networks are also unable to provide the timeliness that emergency bulletins require. Packet transmissions may take several days to propagate on a BBS-by-BBS basis from source to destination. Certain isolated areas of the country may never receive the emergency information due to the lack of suitable packet BBS systems.

Proposal Unworkable in Some Emergencies

The proposed rule change would place a great reliance on publications, telephone networks, computer networks, and VHF-only voice and packet networks as the only available methods for the dissemination of both routine and emergency bulletins. This is a flawed approach which contains an implicit assumption that communications networks and electrical power systems are actually operating. This might not be the case in situations involving severe weather and/or widespread utilities failures.

When these emergencies occur, amateur radio may be the only means of communications available in certain locations. The monitoring of information on bulletin stations would allow affected areas to receive needed information from the outside. This forum would also be available for the dissemination of information which comes out of the affected area(s) to the entire amateur radio community.

As noted above, even if the infrastructure is intact, many amateur radio operators do not have access to computers and/or on-line information services.

Code Practice Transmissions

The petitioner has stated that code practice is available on computer software. Although this is correct, the regular code practice transmissions offer challenges which are not available with computer programs and audio tapes. Use of actual off-the-air code practice helps to develop the ability to copy through noise, fading, and interference.

As noted above, many hams and potential hams do not have access to a computer. These code practice transmissions (like the bulletin transmissions) are available at no charge to anyone with access to a short-wave receiver.

I have personally benefitted from the W1AW code practice transmissions. I used the off-the-air code practice to prepare for code element 1B (13 WPM) when I upgraded from the Technician Class to the Advanced Class, and again to prepare for code element 1C (20 WPM) when I upgraded from the Advanced Class to the Amateur Extra Class. I used the W1AW code practice in addition to computer programs and code practice tapes.

Conclusion

Many of the public service benefits of the Amateur Radio Service are greatly enhanced by the regular operation of the bulletin stations and code practice stations. These transmissions, along with the NTS nets, Field Day, and other scheduled drills, assure that the amateur radio service will be ready to effectively assist in times of emergency. (In fact, reception and copying of the ARRL Headquarters bulletin is one of the components of Field Day).

The petition is not in the public interest, convenience, and necessity, and should be denied in its entirety.

(Signed)

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