

**From:** Francis Canuso <francis.canuso@mail1.newdomain.com>  
**To:** B7.B7(smagnott)  
**Date:** 5/12/96 5:54pm  
**Subject:** WT Docket No. 96-82

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Please be advised that I fully support the deletion of FCC licensing requirements for recreational ships/boats as contained in the referenced docket and NPRM. My name and address are as follows:

Francis A. Canuso  
121 Partree Road  
Cherry Hill, NJ 08003

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**From:** C Wheeler <cwheeler@ccnet.com>  
**To:** B7.B7(smagnott)  
**Date:** 5/11/96 3:11am  
**Subject:** WT Docket No. 96-82 (fwd)

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Resending - address was miscopied in first attempt.

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----- Forwarded message -----

Date: Fri, 10 May 1996 16:18:48 -0700 (PDT)  
From: C Wheeler <cwheeler@ccnet.com>  
To: smargott@fcc.gov  
Subject: WT Docket No. 96.82

Informal comments on the proposal to eliminate certain station licensing requirements for recreational vessels and private aircraft using the Marine and Aviation Radio Services.

From:

Curtis G. Wheeler  
P. O. Box 5054  
San Ramon, CA 94583-0954

E-mail cwheeler@ccnet.com

I very much support the principal of eliminating unnecessary licensing requirements for domestic users of VHF (and higher frequency) transmitters on recreational vessels and private aircraft. I write this as a General Radiotelephone Operator License holder and a concerned private pilot. Please note that when I say I am concerned, I mean that I only want the best for general aviation.

There is no real, direct benefit to the public or the Commission as a result of the current requirements. This is a good move on the part of the Commission to streamline its operations and relieve regulatory burden on users.

However there may be intangible benefits to licensing. I ask the Commission to consider these issues when creating new rules.

Licensing requirements serve as a reminder to those operating transmitters that they are operating in a regulated environment. I can tell from the conversations I have had with many pilots that they are not familiar with many of the Commission's rules that apply to them in part 87.

I know pilots who believe that the radio station license in their personal aircraft conveys authority to operate handheld transmitters "from their backyard so they can talk to fellow pilots flying overhead." Many private and commercial pilots are not aware of 47 CFR 22.925 that prohibits the use of cellular telephones in flight. Many pilots don't understand that current licensing requirements covered other transmitters on board their aircraft such as transponders and distance measuring equipment. These are just a couple of examples of the lack of understanding of many operators of the FCC rules that are applicable to them.

My only fear in the elimination of licensing requirements is that it may further the ignorance of many users of the Aviation Radio Service. Any change in the rules should be clear on when licenses are required.

Station licenses and operator licenses/permits should still be required for non-domestic operations and any use of High-Frequency (HF) transmitters or telegraphy from an aircraft station. I feel that these requirements should be retained so the Commission can still effectively deal with issues concerning transmitters that affect international communications.

Any new rules should also clearly define when station and operator licenses are required for non-aircraft stations in the service. Announcements and news releases from the Commission should be clear, complete and distributed with assistance of the Federal Aviation Administration. The language of the new rules should be clear and as easy to understand as possible. I have no doubt that the information passed among users will eventually get distorted and some will believe they need no license to set up their own unicom or multicom station or that licensing will no longer be required of any stations in

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the aviation service.

I hope the Commission realizes that the everyday users of the Aviation Service are not that familiar with the rules that apply to their telecommunications operations. Pilots tend to use only Federal Aviation Regulations as their guide to what is legal. Please ensure that those effected by new, and I agree, better rules are afforded the information they need to understand the changes.

Sincerely,

/s/ Curtis G. Wheeler  
Private Pilot  
GROL PG 10-25691  
Amateur KD6ELA