

RECEIVED

JAN - 6 1998

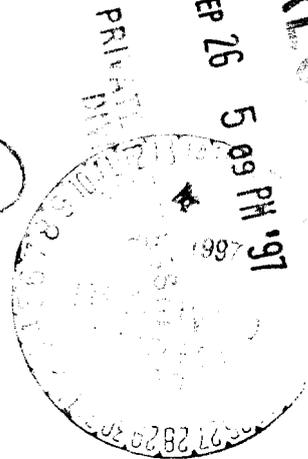
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mike Waters, AA4MW
Yacht ICHI, Vision 2005
Box 119031
Hialeah, FL 33011-9031

DOCKET FILE COPY ORIGINAL

RECEIVED

SEP 26 5 09 PM '97



August 4, 1997

RM-9148

Federal Communications Commission
1270 Fairfield Road
Gettysburg PA 17325-7245
U.S.A.

Comments in SUPPORT of:

"ARRL Petition for Increased Advanced Class VE Examination Administration Privileges"

Dear Sirs:

I hold an Amateur Extra Class License (AA4MW), and am accredited as a VE by both W5YI VEC and ARRL VEC. I have been continuously licensed as an Amateur Radio Operator since 1961. Prior to starting my life as a cruising sailor, I worked as a Computer Engineer and Patent Agent for Motorola in Phoenix Arizona. Currently I live aboard a 45 foot sailboat and have spent the last three years cruising the East Coast of the US and the Caribbean Sea as part of a circumnavigation of the world. The current leg is planned to take us across the Pacific Ocean in two to three years.

Due in part to my background, radio communications, and especially Amateur Radio, has played an important role in my voyaging. I am active in several radio nets on a daily basis and monitor local VHF calling channels continuously. Whenever possible I organize or participate in test sessions so as to allow my fellow cruising yachtsmen to obtain amateur licenses and to upgrade their current amateur licenses. Since leaving the U.S., I have participated as a VE in test sessions held in Georgetown Bahamas, and Chaguaramas Trinidad, in addition to organizing a recent test session held in Papeete Tahiti.

Due to the communication distances required, the lowest class of amateur license which is of any real use to cruising yachtsmen is the General Class. Activity on VHF/UHF in these areas is so sparse as to be of little consequence and the General Class license is the lowest grade license with HF-SSB privileges. The General Class is also the lowest grade of U.S. license recognized by most foreign governments for the purpose of reciprocal licensing.

The General Class license allows access to the worldwide maritime nets which are organized to help long distance sailors on the HF Amateur Bands. It is hard to overstate the importance of these nets to those of us sailing in remote parts of the world. In many countries Amateur Radio is the only practical means of communication with the outside world. An offshore passage on the high seas can last a month or more and again Amateur Radio is the only practical means of communication with the outside world. Weather information, safety warnings, routing

No. of Copies rec'd 0
List A B C D E

Mike Waters, AA4MW

June 19, 1997

Page - 2

information, conditions at planned destinations, contact with friends along the way, and with relatives at home all must rely on these long range Amateur nets.

One vital function of these nets is to let friends and family know that everything is fine while we are otherwise out of touch. This communication provides a valuable service and prevents needless panic by relatives and consequent wasted action by search and rescue authorities.

We had an incident occur which illustrates a typical problem. We were cruising in the Bahamas, a country which does not allow Amateur third party traffic and in addition has a rather "quaint" telephone system. A relative alerted the authorities to have us "call home immediately due to a medical emergency". We were contacted by the local police officer who informed us that all of the emergency services throughout the Bahamas were trying to contact us due to this emergency at home. We called home immediately using the telephone in the police station. The "medical emergency" turned out to be merely panic in the part of the relative (a physician) who hadn't heard from us in several weeks.

Fortunately nothing was lost except frayed nerves and embarrassment, but such incidents are all too common in areas where communication is poor. Such incidents pose an unnecessary burden on the very limited resources of governments in these areas. Had we been offshore, however, a massive search could have been started costing hundreds of thousands of dollars for no purpose.

As a result of situations such as those outlined above, most cruising sailors are both very aware of their need for Amateur Radio and willing to devote the time to study for a license. The problem is that there are very few opportunities to take upgrade tests outside the US and most of us are away from the US for years at a time. It is not unusual to find people who have been ready to take a test, but who have been unable to find a test session for a year or more.

The VE program has been very helpful in allowing administration of at least some Amateur tests in places where many cruising sailors gather, but there is a need for many more test sessions than are now possible. Testing in these remote places is severely restricted because it is hard to get the required 3 Extra Class VEs together at one time and in one place and a test session which is restricted to the Novice and Technician license classes generates little interest for the reasons outlined above.

I would estimate that there are enough prospective candidates to at least double the number of test sessions held in these remote locations and certainly there is a need for test sessions in many more locations. For example during the three months we spent preparing to transit the Panama Canal, I was approached by more than a dozen individuals with requests for test sessions. In the past VEs from the US military bases have conducted test sessions in Panama, but with the removal of US troops from Panama these test sessions are being held far less frequently. We were unable to hold any test sessions while in Panama because we never had three Extra Class VEs together at one time.

Mike Waters, AA4MW

June 19, 1997

Page - 3

The problem is made worse by the fact that most cruising Amateurs themselves upgrade only as far as a General or Advanced Class license, very few go as far as the Amateur Extra Class. Even so, most of these Amateurs are both qualified and willing to become accredited as VEs if they could administer at least General class tests.

I am most intimately familiar with the situation regarding cruising yachts, but I suspect that a similar situation exists in the more remote parts of the US itself and in US overseas territories for similar reasons.

Examples I am familiar with from my own experience in the past few years include being approached by a group of prospective amateurs who live in the vicinity of Greer AZ in Northwest Arizona. Prospective amateurs from this area must travel several hundred miles to Flagstaff AZ, Phoenix AZ or Denver CO for a license test session, as a result few bother with amateur radio. Despite several attempts I was unable to organize a test session in that area. In addition, I understand that American Samoa currently has no regular test sessions and when we were in Puerto Rico regular test sessions were held only in San Juan.

In each of these examples the required three VEs were available, but one or more of the three VEs held only an Advanced Class license so elements 1(B) and 3(B) could not be administered and the candidates were unwilling to be limited to the Novice and Technician tests. In the end no testing at all was done.

It would seem reasonable to allow VEs to administer any test element that they have already passed. That is to say, for General Class VEs to administer up to General Class tests and for Advanced Class VEs to administer up to Advanced Class tests.

However merely allowing Advanced Class VEs to administer all test elements up to 1(B) and 3(B) as proposed by ARRL would greatly increase the pool of potential VEs in these remote areas allowing test sessions to be held many locations where test sessions are not now available.

In summary, I SUPPORT the ARRL petition since this change will greatly improve access to Amateur Radio by persons in remote areas and Americans who live and travel outside the US for extended periods.

Sincerely,



Mike Waters, AA4MW, FO0WAE



DOCKET FILE COPY ORIGINAL

AM - 9148

From: Charles Fowler <ke4uwx@stc.net>
To: A4.A4(FCCINFO)
Date: 12/18/97 9:26pm
Subject: ARRL Petition for increased Advanced Class VE Examination Administration Privileges.

Dear Sirs:

I am Charles Ray Fowler, KE4UWX, An advanced amateur radio operator in a small radio club in North Georgia. I became certified as a VE on December 1, 1997

It is very difficult in our radio club to get three extra class VE's to administer tests in our area, and we must announce that the testing session is only open to test for Tech Plus or lower. The approval of the ARRL Petition would allow us to raise the testing level to include testing thru General class and our club would like to see this included into current rules.

In the real world, the VE's do not use their radio knowledge to administer or grade the tests. The tests come in booklet form, with an answer sheet, and an overlay grading template. The VE's lay the template over the answer sheet and grade the test. Even the code test comes with a translation of what is on the code test and an answer sheet for the written test. Anyone who is trained in administering the test, can test for any class license without a knowledge of the test content.

The ARRL VE training program does a good job of establishing the entire test procedure and training the new VE's in the method and rules to administer the test in a fair and orderly manner. I feel that any trained VE should be able to administer any test elements. If this is considered, It may be desirable to have one member of the VE team be an extra class even if it is not required for testing purposes. This would allow all testing sessions to be open to all classes and make Amateur Radio more available to every one.

Thank you in advance for considering this in your deliberations.

Yours Truly,

Charles Ray Fowler
844 Duncan Bridge Road
Santee, Ga. 30571

December 19, 1997

CC: FCCMAIL.SMTPNLM("vec@arrl.org")

RECEIVED

JAN - 6 1998

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

No. of Copies rec'd
List A B C D E

0