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Before the
Federal Communications Commission
Washington, D.C. 20554

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JUN 12 1998

In the Matter of)
)
Assessment and Collection of)
Regulatory Fees for Fiscal)
Year 1998)

NPR MD Docket 98-36

COMMENTS

The acquisition of a special Amateur Radio call sign under the Vanity Call Sign Program does not serve any functional need or purpose. Any normal sequentially assigned call sign serves as well.

Therefore applicants for special call signs are doing so for personal "vanity" reasons such as to obtain their personal initials, other unique letter combinations of personal relevance, or the call sign of a deceased close relative.

Since a Vanity Program call sign assignment is a special privilege granted to licensees, it is entirely reasonable to expect that those who receive special consideration should pay for it. Because these special call signs serve no useful functional purpose, it is reasonable and proper that the issuance of these special call signs be a source of revenue.

At initiation of the Vanity Call Sign Program the license fee was \$30.00. This is a fee of less than a penny per day over the 10 year life of the license. I suggest that the \$30.00 fee be reinstated for eligible applicants for the call sign of a deceased close relative. Eligible radio clubs are permitted to apply for the call sign of a deceased former member as a memorial. Radio clubs are able to spread the cost of a Vanity Call over their membership, and therefore a fee of \$70.00 is suggested as reasonable. For all other individual licensees who are not eligible to apply for a deceased relative's call sign, the present fee of \$50.00 is suggested as reasonable, as it is less than 1.4 cents per day over the 10 year life of the license.

None of these proposed fees would prevent any licensee from full participation in Amateur Radio that they would otherwise have because no licensee is required to obtain a special Vanity Call Sign. I believe the foregoing reflects the intent of the Congress in its desire to generate appropriate revenue from the various uses of the radio spectrum.

Respectfully submitted,

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June 10, 1998

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