

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

**In the Matter of**

**AMENDMENT OF PART 97 OF THE  
COMMISSION'S RULES TO RE-ALLOCATE  
FREQUENCY SPECTRUM IN THE  
AMATEUR RADIO SERVICE**

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**To: The Commission**

**PETITION FOR RULE MAKING**

Now comes Cord Davidson, a FCC licensed amateur radio operator, who hereby respectfully requests the Federal Communications Commission to issue a Notice of Proposed Rule Making to amend Title 47 U.S.C. Part 97 of its rules regarding the amateur radio service for the following reasons:

**1. Summary** Amateur radio operators are granted allocations in several bands in the high frequency radio spectrum (1.8 MHz to 30 MHz). Several of these bands are divided by license class; that is, parts of the individual bands are granted exclusive use to amateur radio operators based on their license class. The purpose of this petition is to request the FCC reallocate frequency segments granted to holders of Advanced class and higher license holders to include General class license holders.

**2. Discussion** Prior to April 15, 2000 the FCC issued five different classes of amateur radio licenses: Novice, Technician, General, Advanced, and Extra. After April 15, 2000 the FCC stopped issuing new licenses for the Novice and Advanced classes. Currently, there is 250 kHz of spectrum allocated to holders of Advanced and higher licensees. An analysis of data published online of amateur radio licenses<sup>1</sup> shows that there were 101,725 Advanced class licensees in April 2000. As of September 2014, there were 51,698 Advanced license holders. Because the FCC is no longer issuing Advanced amateur radio licenses, the number of Advanced licenses is declining by attrition – the license either expired or the holder upgraded to Extra class. Although a holder of an Advanced class license may renew upon expiration, the number of Advanced class licenses are still significantly declining. In April 2000 there were 111,337 general class licenses. As of September 2014 there are 168,790 General class licenses. According to these figures the number of Advanced class licenses have declined by 49% while General class licenses have experienced a steady growth of 34%. A recent press release<sup>2</sup> from the American Radio Relay League cited the growing number of licenses in all classes except Novice and Advanced which are declining. Considering the fact that the Advanced class license is obsolete, the number of licenses in this class is drastically decreasing, and that the FCC has not issued new Advanced licenses in almost 15 years, General class licenses privileges should be expanded. Otherwise, with the steady growth of General class licenses it would be detrimental to limit the bandwidth available to this license class.

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<sup>1</sup> <http://www.ah0a.org/FCC/licenses.html>

<sup>2</sup> <http://www.arrl.org/news/amateur-radio-showing-steady-growth-in-the-us>

**3. Proposal** This petition specifically requests that the FCC modify Part 97.301(d) of its rules to allow General class licenses to transmit<sup>3</sup> on the following frequency segments:

<b>Wavelength band</b>	<b>MHz</b>
75m	3.700-4.000
40m	7.025-7.300
20m	14.175-14.350
15m	21.225-21.450

**4. Conclusion** This petition does not propose to affect the operating privileges of any other amateur radio license class other than General. As the number of Advanced licenses is decreasing at a rapid pace, the number of General class licenses is growing steadily. Considering that an Advanced license is obsolete and the number of Advanced licenses has fell so significantly, it would be prudent that the FCC update its rules and re-allocate frequency segments to realistically provide additional bandwidth to General class licenses.

Respectfully submitted,

Cord Davidson

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<sup>3</sup> These proposed changes show the specific frequency segments this petition seeks to amend. This proposal is intended for ITU regions 1, 2, and 3. Unaffected frequency segments are omitted for clarity.