Mark F. Krotz 926 East Greenway Street Mesa, Arizona 85203 (480) 833-5809

mkrotz@cox.net

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Federal Communications Commission Office of the Secretary 445 12th Street, SW Washington, DC 20554

Subject: Petition for proposed changes in 47 CFR Part § 97.25 License term for Amateur Radio.

Commissioners:

§ 97.25 License term. An amateur service license is normally granted for a 10-year term.

The FCC originally granted Commercial Radiotelephone Operator licenses for a term of 5 years. To fit in with the changing technology, and in the spirit of deregulation, and to reduce its own personnel and other associated cost, the Commission eased licensing requirements. In 1985 the FCC began renewing GROL licenses for lifetime.

The Federal Aviation Administration issues permanent Airman Certificates.

The FCC processes about 70,000 renewals per year (10% of 700,000), or about 5,830 per month, or nearly 300 per workday. Depending on the amount of human interaction required, this could be quite costly. Where there is no human interaction by the FCC, (i.e. those done remotely by VECs), then the figure goes down a bit. Still, it's a huge regulatory paper mill with questionable benefits.

It would be mutually beneficial for the FCC and Amateur Radio operators to update Part 97 to grant Operator Licenses for lifetime. The FCC would benefit by reducing administrative costs.

Respectively submitted:

Mark F Krotz, N7MK