

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC

In the matter of:)
)
Petition for proposed changes in) RM-11760
47 CFR Part 97.25 License term for)
Amateur Radio)

COMMENTS OF RAYMOND N. ANDREWS, K9DUR

Background

In his Petition for Rulemaking (“Petition”), Mark F. Krontz (“Krontz”) is proposing to make Amateur Radio Service licenses permanent and non-expiring citing the 1985 decision to make General Radio Operator Licenses (“GROL”) non-expiring and last through the individual’s lifetime. Krontz also cites airman certificates issued by the Federal Aviation Administration (“FAA”). While I can agree with his proposal in principle, I fee that the problems it would create far outweigh any potential benefits.

Discussion

I wish to re-emphasize the comments made by Michelle A. Bradley, K3UN, in her comments.

Krontz cites both General Radio Operator Licenses and FAA Airman Certificates as precedents for lifetime licenses. A very important difference between a GROL and an Amateur Radio Service license is that a GROL is only an operator license, while an Amateur Radio Service license consists of both an operator license and a station license with an associated call sign.

The FAA Airman Certificate is not a valid precedent for a lifetime Amateur Radio Service license. Although it is issued for the lifetime of the holder, it is not valid unless accompanied by a current medical certificate which must be renewed periodically. N addition, the holder must complete an annual or bi-annual proficiency flight with a certified instructor. Therefore, the Airman Certificate is not in and of itself a lifetime authorization to operate an aircraft.

If an Amateur Radio Service license were issued for the lifetime of the holder, there would have to be a mechanism put in place to ensure that the FCC would be notified upon the death of a licensee. Otherwise, the call sign would remain active forever with the following 2 consequences: 1) the call sign would not be available for re-issue to another licensee, & 2) an opportunity would be created for an unlicensed individual to operate using the call sign of a deceased licensee. Currently, there is no requirement for the FCC to be notified of the death of a licensee, and in nearly all cases the only way that his/her call sign is made available for re-issue is the end of the two-year grace period after license expiration.

The current renewal system for Amateur Radio Service licenses is almost totally automated with the implementation of the ULS and the ability for VEC's to electronically submit renewals as well as other licensing actions. Therefore, the impact on FCC personnel and resources of converting to lifetime licenses would be minimal.

Conclusion

Amateur radio station call signs are a limited resource. Under the current call sign structure, there are just over 10 million possible call signs available. However, just over 9 million of those are Group D call signs. There are only 124,800 Group A call signs, while there are nearly 140,000 Amateur Extra class licensees. Similarly, there are only 527,280 Group C call signs while there are over 536,000 General and Technician class licensees. Clearly, amateur radio call signs are a limited resource and there must be some method of releasing call signs of deceased licensees so that they may be re-issued. We already have more Amateur Extra class licensees than there are Group A call signs. The same is true of General and Technician class licensees and Group C call signs. Making an Amateur Radio license a lifetime license would make this situation worse than it already is.

For these reasons, and because of the increased opportunity for illegal, unlicensed operation created by a lifetime license, I oppose the rule changes proposed in RM-11760.

Respectfully submitted,

/S/

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