

I am writing in opposition to RM-11760, a petition filed by Mark F Krotz to extend amateur radio license terms to the lifetime of the license holder.

Several questions come to mind. How will the Commission determine when a license should expire? Will the Commission rely on cancellation requests from family members of the deceased licensee? Will the Commission rely on cancellation requests from amateur radio licensees desiring to apply for the deceased licensee's callsign under the Vanity Callsign assignment system? Will the Commission be required to access the Social Security database(s) to cancel licenses in a timely manner to facilitate recycling of callsigns for Vanity applications and routine license expirations? Mr. Krotz's petition does not address these questions.

It is my opinion that the examples cited by Mr. Krotz do not support adopting a lifetime amateur radio license. Since the inception of the Vanity Callsign system, amateur radio licensees have shown a great interest in applying for callsigns made available after a license has been allowed to expire (I am a holder of a callsign issued under the Vanity program but it had not been held by anyone prior to my application in 1998 according to my research). This same interest does not appear to exist among holders of the General Radio Telephone Operators License (I am a holder of a GROL) and, in my opinion, does not provide adequate support for a lifetime amateur radio license. It also seems to me that the citation of a Federal Aviation Administration certificate by Mr. Krotz to support the petition is inadequate as it likely does not share the unique nature of amateur radio license callsign assignment.

Only the Commission has the data available of the manual burden on staff that renewal and modifications of amateur radio licenses represents. My experience with ULS is that licenses may be renewed and certain modifications made through the ULS World Wide Web interface without intervention by Commission staff. Even with a lifetime amateur radio license term, some modifications to amateur radio licenses will be filed such as mailing address and name changes. For those modifications that will not be filed through ULS, some burden will still be placed on Commission staff to handle the filings.

The unique relationship of many amateur radio licensees to the callsigns they hold has resulted in a system where the natural expiration of license terms leads to desirable callsigns being applied for under the Vanity Callsign System. A lifetime amateur radio license term would likely lengthen the wait for desirable callsigns and frustrate future applicants due to certain callsigns being almost permanently unavailable unless an additional system is put in place to track when amateur radio licensees become deceased. The petition also fails to show how much Commission staff burden would be lessened by adoption of a lifetime amateur radio license term (in fairness, without data provided by the Commission, the estimation of the actual burden can only be an assumption).

In conclusion, I recommend that RM-11760 be DISMISSED.

Respectfully submitted,

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