

Comments in re: RM-11760

I oppose the proposed changes, which would effectively create “forever” licenses, for the following reasons:

1) Renewal of amateur licenses every 10 years is simple, easy and fast. FCC’s existing system of online renewal works well. Renewal by “paper” methods requires only a single-page form, envelope, and one unit of first-class postage. If that is too much to ask of a licensee, there’s something wrong.

2) “Forever” licenses would complicate the vanity call system and increase FCC administrative work. With the existing system, if a licensee with a “desirable” callsign allows a license to expire and does not renew in the grace period, the callsign becomes available automatically. With “forever” licenses, there would be a big increase in people sending FCC documentation of deceased licensees in order to release the desirable callsigns held by licensees who have died. Such documentation would have to be manually processed by FCC to cancel licenses that would have otherwise have been handled automatically.

3) The FCC database would include an increasing number of license records that were issued but which are never used, because the licensee has died or otherwise lost interest, and did not have a callsign considered “desirable”. There would be the illusion of growth in the Amateur Radio Service, regardless of actual active license numbers.

4) In the Amateur Radio Service, the operator and station licenses have pretty much become one and the same, to simplify processing. Any separation of the two would merely complicate matters and increase administrative work, with no real benefit to FCC or licensees.

Please deny RM-11760 as proposed, with no further action.

Sincerely

James P. Miccolis, N2EY

Licensed radio amateur since 1967 (Novice 1967-68, Advanced 1968-1970, Extra since 1970)