

National Conference of VECs

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FEDERAL COMMUNICATIONS COMMISSION

October 31, 1998

Office of the Secretary
FEDERAL COMMUNICATIONS COMMISSION

The Portals,
445 Twelfth St., S.W.,
Washington, DC 20554.

ATTENTION: Magalie Roman Salas

Ex Parte Presentation **PROCEEDING: WT Docket No. 98-143**

Dear Ms. Salas,

In accordance with 47 C.F.R. §1.1206(b)(2) of the Commission's Rules, we are attaching an original and one copy of the ex parte presentation memoranda that the National Conference of VECs made before the FCC's Public Safety and Private Wireless Division of the Wireless Telecommunications Bureau on October 21, 1998. This meeting took place at 11:00 a.m. and lasted about one hour. We have also provided copies to those in attendance.

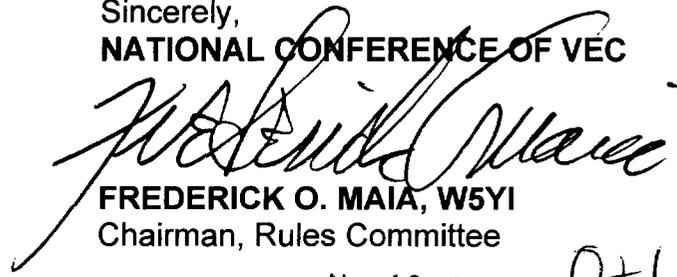
FCC personnel in attendance:

| | |
|-----------------------|--|
| (Ms) D'wana R. Terry, | Chief; Public Safety and Private Wireless Division |
| Herbert Zieler, | Deputy Chief, Public Safety and Private Wireless Division |
| William T. Cross, | Policy and Rules Branch, Public Safety and Private Wireless Div. |
| Maurice J. DePont, | Policy and Rules Branch, Public Safety and Private Wireless Div. |
| Ira Keltz, | Universal Licensing System, Wireless Telecommunications Bureau |

The presentation was made by Winford Guin W2GLJ, Germantown, Tennessee and myself, Frederick O. Maia W5YI, Arlington, Texas, on behalf of the National Conference of Volunteer Examiner Coordinators in the Amateur Service.

Please contact me if you require further information. Thank you.

Sincerely,
NATIONAL CONFERENCE OF VEC



FREDERICK O. MAIA, W5YI
Chairman, Rules Committee

Enclosures:

No. of Copies rec'd 021
List A B C D E

1. Our Number One Concern - Growth, or lack of it - in the Amateur Service

- a. The number of Amateurs with high speed Morse proficiency - and the number of Amateurs using CW is generally greatly overstated. A person with just 5 wpm "slow code" proficiency can not be thought of to be Morse proficient - nor do they use CW.
- b. The Amateur Service today can be thought of as about one-third "No-Code", one-third "Slow Code" and one-third "Fast Code."
- c. Ten years ago, 60 percent of all amateurs held fast code licenses - that is General, Advanced and Amateur Extra Class licenses. It is now less than 40% and continues to decrease. And for the third year in a row, there are less total General, Advanced and Extra Class amateurs than the year before.
- d. All growth in the Amateur Service over the past five years has come at the no code Technician level. Even though the Technician Class continues to grow, for the first time ever, there are now less total amateurs than the year before.
- e. Amateur radio needs to be streamlined, simplified, updated and revitalized.

2. Amateur Service is overly complex

- a. Our system with six license classes and eight examinations is the most complicated and complex in the world. We believe that the number of license classes can be reduced from six to three, and the number of examinations from eight to four.
- b. Both the FCC and ARRL proposed four license classes which correspond to the current Technician, General, Advanced and Extra Class.
- c. There is little difference, however, in the frequency privileges accorded to the Advanced and Extra Class. Except for the code speed, the qualifications are basically the same. The VECs believe that these classes can be combined which would leave us with the Technician, General and Extra Class.
- d. The Technician class examination would contain 50 VHF/UHF-oriented questions from the current Element 2 and 3(A) pool) which would be merged. The General would also contain 50 HF-oriented questions from the Element 3(B) pool) and;
The Extra would contain 100 technically-oriented questions from the merged Element 4(A) and 4(B) pool)
- e. We do not agree that the license class names should be changed nor that the Novice, Tech Plus or Advanced Class should be "grandfathered" to General or Extra without examination. (i.e. Both General and Extra Class cover volunteer examinations which are not covered in other examinations.)

3. Morse Code examinations in the Amateur Service

- a. It is important that the Commission realize that Morse code is primarily viewed by the majority of the Amateur community as a tradition which must be perpetuated. It is a ritual in that is closely related to “hazing” — or the “rite of passage” — into the Amateur Service. Morse code has also been used over the years as a means to control access to the ham bands. The need for Morse code is really not about communications.
- b. Its use today in the Amateur Service is totally recreational. Requiring Morse proficiency as a licensing provision is not consistent with the Commission’s mandate to make radio widely available and to encourage the use of new technologies -- or with the purpose of the Amateur Service.
- c. The fact remains that Morse Code is just another mode which does not deserve special consideration — and we do not think it should not be the cornerstone upon which the service is built. But it is required by international law.
- d. A single 5 WPM code examination, however, meets the international treaty requirements and would eliminate the need to grant medical credit to handicapped amateurs.
- e. The VECs find the proposal by the American Radio Relay League that would require VEC’s to obtain and review medical records prior to granting a waiver of the higher speed code examinations unacceptable. The VECs are
 - (a) Uncomfortable in getting involved in an examinee’s medical history.
 - (b) They are not qualified to review medical records and;
 - (c) We further believe examinees have a right to keep their medical records private and confidential.
- f. “Handi-Hams,” a large organization of disabled Amateurs, told us that they did not believe that requiring high speed telegraphy when it is not needed from a regulatory perspective would survive a legal challenge. We question any procedure that makes it unnecessarily more difficult for the handicapped to upgrade their operator license. And the ARRL procedure may not be lawful under the *Americans with Disabilities Act*.
- g. The VEC System — that is, the VEs and the VECs — are caught in the uncomfortable area between
The applicant who wants to operate HF but sees no reason to learn Morse,
The amateur community — many of whom believe that traditions and nostalgia are extremely important and;
The medical profession -- many of whom are not even familiar with (or seem to care) how a disability relates to copying code.

Each group seems to have their own view of Morse code and what constitutes a “handicap” that adversely impacts their ability to copy it.

- h. Another argument we hear is that the ability to learn Morse code identifies a motivated and desirable Amateur. We see no relationship between Morse knowledge and personal characteristics.
- i. The FCC should insure that the examination elements are appropriate for the types of operation that will be performed by the licensee. It is not logical to require manual Morse proficiency as a licensing requirement when code can be easily copied by machine and there are many new, faster data technologies with automatic error correction that can be used on the high frequency bands.
- j. In short, manual Morse code should not be the backbone of the Amateur Service in this computer, digital and information-based age. We don't think otherwise qualified individuals should ~~not~~ be precluded from experimenting, communicating or participating in public service on the HF bands because of a personal dislike for Morse code.
- k. We see no justification to require Morse proficiency in excess of the minimum required by our treaty obligations. Again, a single 5 WPM code examination more than meets this criteria. If the Amateur Service did not exist and was being designed from "ground zero" today, it would not contain a Morse proficiency requirement at all.
- l. Perhaps our most compelling reason for wanting a single minimum speed Morse examination is that the mode is a barrier to fuller use of the Amateur Service ...and the higher the speed, the bigger the barrier.

4. Written examinations in the Amateur Service

- a. The question pools are revised on a four year cycle by the VECs internal Question Pool Committee (QPC). Since the Amateur community participates in the process, it takes more than a year to complete the question revisions, ...to get new study material in the marketplace ...and to introduce new examinations.
- b. We start at the beginning of the year with a new syllabus. After new and revised questions are solicited from the Amateur community, the QPC works on the new question pool by e-mail. The newly revised question pool is distributed to the public in digital form on December 1st. We ask license preparation publishers to have the new material available in the marketplace by May. This gives examinees 60 days before the newly revised questions must be used in all examinations.
- c. VECs consider the license preparation publishers to be an important part of the VEC System and we work closely with them. It is **very important** that there be a smooth transition from the current system to a restructured Amateur Service and that any financial burden be kept to a minimum. We

tell the publishers that the questions will remain current for a four year period and they base their activities and quantities on this premise.

- d. At present, we revise five question pools on a four year cycle. We would like to change that to three pools on a three year cycle.

The current question pool revision schedule (See page 4):

| | | | | <u>Questions</u> | |
|---------------------------------------|------------|----------------------|----------------------|------------------|-------------|
| | | <u>Last Revision</u> | <u>Next Revision</u> | <u>Pool</u> | <u>Exam</u> |
| Element 2 & 3(A) | Novice | 1997 | July 1, 2001 | 480 | 35 |
| Element 3(A) | Technician | 1997 | July 1, 2001 | 386 | 30 |
| Element 3(B) | General | 1998 | July 1, 2002 | 440 | 30 |
| Element 4(A) | Advanced | 1995 | July 1, 1999 (*) | 580 | 50 |
| Element 4(B) | Extra | 1996 | July 1, 2000 (*) | <u>440</u> | <u>40</u> |
| (* = Revision has been put on "Hold") | | | | 2326 | 185 |

- e. Proposed question pool revision schedule:

| | | | | <u>Questions</u> | |
|-----------------|--------------|----------------------|----------------------|------------------|-------------|
| | | <u>Last Revision</u> | <u>Next Revision</u> | <u>Pool</u> | <u>Exam</u> |
| Element 3(A) * | Novice/Tech. | 1997 | July 1, 2001 | 500? | 50 |
| Element 3(B) ** | General | 1998 | July 1, 2002 | 500? | 50 |
| Element 4 *** | Extra | 1996 | July 1, 2000 | <u>1000?</u> | <u>100</u> |
| | | | | 2000 | 200 |

(* = Pool would consist of merged Element 2 and 3(A) VHF-oriented questions.)

(** = Consist of current Element 3(B) and eventually HF questions from Elem. 2.)

(*** = Consists of merged Element 4(A) and 4(B) technically-oriented questions.)

The next QPC revision completed by QPC would be Element 4 which would be implemented on July 1, 2000. The QPC would work on it during 1999.

- f. It is important that the current license class names be retained rather than Class A, B, C or 1, 2, 3.
- Training aids in the marketplace are identified by the current names. Any change will confuse examinees and would adversely impact publishers and distributors who already have these titles "on the shelves."
 - Although new Novice and Advanced Class licenses would be phased out, these classes would be able to be renewed or modified. It is unwieldy to mix an old and new license class naming system.
 - Using the same license class names would eliminate the need to reissue licenses. Otherwise, it would take 12 years to phase out the old license class naming system which is excessive and confusing.

5.) Mandating the general topics asked in written examinations.

- a. The Commission asked for comment on whether the ten topics which must be asked in all written examinations should continued to be established in

the rules. At present, the QPC must provide a bank of ten times as many questions as will appear on any examination.

- b. We believe the primary interest of the Government in the Amateur Service examination process and in the licensing of amateur radio operators is to minimize interference to all users of the radio spectrum, ...to protect health ...and to promote safety?

Much of the questions asked in the ham exams are not related to interference, health and safety.

- c. Is it important to the Commission that all Amateur radio operators be knowledgeable in such topics as radio wave propagation, circuitry, equipment components, and so forth? Especially since due to their complexity, almost all transmitters today are purchased in the commercial marketplace. Fifty years ago, most ham gear was home constructed.
- d. It seems that applicants increasingly want to use the ham bands for personal, public service and hobby-type communications among their friends, community and family — rather than as an educational vehicle to enhancing their electronics knowledge.
- e. The international law provides for “...self-training, intercommunication and technical investigation.” The required question topics in Amateur Service examinations are heavily weighted toward technical matters. Is it important that beginners know about the internal circuits of their transceiver when they all use commercial equipment? Overly technical questions also serves to keep the number of Amateur radio operators low. Questions on electronic circuitry are more appropriate for the higher class operator who is more inclined to experiment
- f. We believe that the content of the question pools should be left up to the VECs Question Pool Committee. Some of the current topics fail to take changes over the years in operating habits, technology and transmitting equipment into consideration.

6.) Universal Licensing System

- a. The VECs are still very confused about the Universal Licensing System — when it will be implemented, the forms and filing procedures ...And how it will affect them. We have been hearing for more than two years that it is on the way, but we know very little about it. Here are some of our thoughts about ULS:
- b. The Amateur Service is already filing electronically. To minimize cost and confusion, any new system should closely mirror the existing system as much as possible. It must be emphasized that the VEC System is a volunteer operation and funds are not available for VECs to pay for costs

associated with significant changes.

- c. The FCC provided electronic filing software to the VECs when electronic filing was first implemented so that they could “batch file” applications. Will this be provided?
- d. Inputting applications one at a time via an online web-based form will not suffice. A provision must be made for a “batch filing” system.
- e. Most VECs have developed their own sophisticated database systems in order to keep track of examinees and examination sessions. The VECs are routinely asked — such as for obtaining enforcement information — about examiners, examinees and past exam sessions so the database programs are necessary. Some of these systems are interfaced to electronic filing and to the FCC’s online database to insure accuracy. It is very important that this be taken into consideration. There is more to electronic filing than just inputting an application and then forgetting about it. A means must be provided for later accessing this information since the FCC no longer has any examination records at all.
- f. The Amateur community makes effective use of the online database that the FCC publishes to the Internet and updates daily. Many Amateur clubs and commercial companies have developed online systems that make use of this database. It is very important that this information continue to be provided by the Commission.
- g. Except on Vanity Call sign applications where there is a regulatory fee, we question the necessity of requiring a *Taxpayers Identification Number* (Social Security Number) on the proposed application Form 605. The reason given by the Commission for the necessity to collect the SSN is that it is required by the *Debt Collection Act* to facilitate collection of delinquent debts. The Amateur Service does not have an application fee, therefore funds are not involved.
- h. We believe the identifying information or “key” in the Amateur Service portion of ULS should be the applicant’s call sign rather than the SSN. Foreign nationals - which can be — and are — licensed as radio amateurs - do not have SSNs.
- i. The VECs should work close with the Commission’s Universal Licensing System. No one from ULS has contacted the VECs regarding an implementation schedule -- or our needs and concerns. From what we have seen thus far, it appears that the people working on ULS do not have a good knowledge of how the Amateur Service works.
- j. It is also very important that any amendments to Amateur Service license structure, qualifying examinations or to the Morse code handicapped waiver system be adopted and implemented prior to developing Universal Licensing System processes for the Amateur Service. This will eliminate having to again modify ULS to coincide with these changes.

VEC Concerns - FCC, Washington, DC

October 21, 1998 - 11:00 a.m.

1.) Growth in the Amateur Service - our Number One Concern

Number of amateurs in database with high speed code proficiency is greatly overstated.

- (a.) Database includes amateurs in the two year grace period - 17% overstatement
- (b.) ARRL says 8% of all 13/20 wpm is via a Medical waiver - 1 person in 12 - 8% overstatement.
- (c.) Transition from 5 year to 10 year term license meant Amateurs who would not be renewing their license are carried on the roles for another 5 years - 5% overstatement
- (d.) It is questionable as to how many currently licensed amateurs could now pass a high speed code exam. Unknown overstatement.
- (e.) The number of Codeless Technicians are not overstated since licensing stated in 1991.

| <u>Class:</u> | <u>Database:</u> | <u>Percent:</u> | <u>Adjusted:</u> | <u>Percent:</u> |
|---------------------|------------------|-----------------|------------------|-----------------|
| Novice | 74304 | 10.3% | 52012 | 9.3% |
| Technician | 188528 | 26.2% | 188528 | 33.7% |
| Tech Plus | <u>146492</u> | <u>20.4%</u> | <u>102544</u> | <u>18.3%</u> |
| No/Slow Code | 409324 | 56.9% | 343084 | 61.3% |
| General | 122461 | 17.0% | 85716 | 15.3% |
| Advanced | 110939 | 15.4% | 77657 | 13.8% |
| Extra Class | <u>76660</u> | <u>10.7%</u> | <u>53662</u> | <u>9.6%</u> |
| Fast Code | 319060 | 43.1% | 217035 | 38.7% |
| TOTAL: | 719364 | 100% | 560119 | 100% |

Amateur Radio has changed in recent years.

- (1.) Equipment has gotten more sophisticated. All is now solid state microprocessor based. Extremely few amateurs build their transmitters today.
 - (2.) The hobby is primarily oriented towards "operating", rather than "technical" experimentation - especially at the beginning level.
 - (3.) The direction seems to be away from license classes that require manual Morse code.
 - More than 60% of all amateurs are no code or slow code proficient and increasing.
 - About one amateur in three is a no code Technician.
 - Ten years ago, 60 percent of all amateurs held fast code licenses. It is now less than 40% and continues to decrease.
 - For the third year in a row, there are less total General, Advanced and Extra Class amateurs than the year before.
 - All growth in the Amateur Service over the past five years has come at the no code Technician level.
 - (4.) The number of new (first time licensed) and Amateurs who upgrade their license to a higher class is decreasing. (82% of Technician Class amateurs do not upgrade.) The number of applicants being administered license examinations has been steadily decreasing and is now down more than 50% over five years ago.
- We believe that Amateur Service licensing and qualifying examinations should reflect these trends. Around the world less importance is being placed on Morse proficiency and more emphasis in making ham radio more accessible.

2.) Amateur Radio is overly complex

We believe the current system of six Amateur Service license classes and eight different license classes is excessively complex. The primary competition for the technically minded hobbyist is the Internet and computers which requires which requires no examinations, no license and has no rules. Amateur radio needs to be simplified, streamlined and revitalized.

The VECs agree with the Commission's intent to streamline the Amateur Service and to simplify the licensing process. In a nutshell, we believe that the following changes should be made to the Amateur Service qualifying requirements.

1.) Reduce the number of license classes from six to three.

- Both the FCC and the ARRL proposed 4 license classes which would coincide with Technician, General, Advanced and Amateur Extra class.
- The VECs believe that the Advanced and Extra Class can be combined since there is so little difference in frequency privileges. The three remaining classes would be Technician, General and Extra Class.
- The Novice and Advanced would be phased out. That is, these licenses could be renewed or modified, but no new licenses would be issued.
- The Technician Plus license would be renewed as Technician - but would retain credit for the 5 words-per-minute examination.

2.) Reduce the number of examination elements from eight to four.

Element 3(A) VHF/UHF/Microwave-oriented 50 question multiple choice examination

Element 3(B) HF-oriented 50 question multiple choice examination.

Element 4 Technically-oriented 100 question multiple choice examination.

Element 1(A) One code speed, 5 WPM, to meet the international Treaty requirement.

An important aspect of this lineup is that it would utilize license preparation material already in the publishing marketplace. The Novice and Technician question pools, and the Advanced and Extra Class question pools would be combined. This would permit the examinee to easily locate training material and would reduce the burden on publishers and distributors. The number of questions in the General and Extra Class examinations would be increased to compensate for the code speed reduction. All question pools would be reviewed and revised on a three year cycle.

3.) New Amateur Service line up will be attractive to all existing license classes.

| | |
|------------------|--|
| Novice Class | Would be able to upgrade to General by passing Element 3(A) and 3(B). <u>No additional code required.</u> 200 watt CW access to entire 80/40/15/10 m bands. 200 watt phone access to 10 m band (28.3 to 29.7 MHz.) Same VHF/UHF privileges. (These privileges would also apply to the current Tech Plus Class and Technicians with code credit.) |
| Technician Class | Could upgrade to General by passing Element 3(B) and 5 WPM code. |
| Tech Plus Class | Could upgrade to General by passing Element 3(B). <u>No additional code required.</u> Technicians licensed before March 21, 1987 could apply at a VE session for upgrade to General without taking any examinations. |
| General Class | Could upgrade to the Extra Class by passing 100 question Element 4. <u>No additional code required.</u> FCC should consider extending Advanced telephony privileges to the General Class since no new Advanced Class licenses would be issued. |
| Advanced Class | Could upgrade to Extra Class by passing 100 question Element 4. <u>No additional code required.</u> |

The VECs do not believe that Novices and Technician Plus operators should be "grandfathered" (automatically upgraded) to the General Class level - nor the Advanced Class "grandfathered" to Extra Class.

3.) Morse Code testing in the Amateur Service

The VECs believe there is no longer any public interest served by requiring code testing. Morse code communications is just another mode which does not deserve any special priority. A single five words-per-minute (WPM) telegraphy examination meets the international treaty requirement and would eliminate the need to grant medical credit to disabled amateurs for the higher code speed examinations.

- The VECs find the proposal by the American Radio Relay League that would require VEC's to obtain and review medical records prior to granting a waiver of the higher speed code examinations totally unacceptable. The VECs are (a) uncomfortable in getting involved in an examinee's medical history and (b) are not qualified to review medical records. We further believe examinees have a right to keep their medical records private and confidential.
- Courage Handi-Hams System, a large organization of handicapped Amateurs told us that they did not believe that requiring high speed telegraphy when it is not needed from a regulatory perspective would survive a legal challenge. We question whether any procedure that makes it unnecessarily more difficult for the handicapped to upgrade their operator license is even lawful under the *Americans with Disabilities Act*.
- The VEC System — that is, the VEs and the VECs — are caught in the unpleasant middle ground between the applicant, the amateur community and the medical profession. Each seems to have their own view of what constitutes a "handicap" that adversely impacts high speed telegraphy.
- Over the years, Morse code proficiency has been used as a way to control the number of Amateurs operating on the ham bands. This position is not consistent with the Commission's mandate to make radio widely available and to encourage the use of new technologies.
- According to some Amateurs, the effort that it takes to learn Morse communications identifies a motivated and desirable Amateur. It has been our observation, however, that many — and perhaps most — of the non-compliant, abusive operators are indeed Morse proficient. We see no link between Morse knowledge and personal characteristics. Morse should not be used as a "filter."
- The FCC should insure that the examination elements are appropriate for the types of operation that will be performed by the licensee. An amateur operating in the voice or data mode does not need to be Morse competent. To require manual Morse proficiency as a prerequisite to the use of the newer, faster automatic, error-correcting data technologies on the high frequency bands is absurd and illogical. Manual Morse code should not be the backbone of the Amateur Service in this computer, digital and information-based age.
- An otherwise qualified individual should not be precluded from experimenting, communicating or participating in public service on the HF bands because of a personal dislike for Morse code.
- It is inappropriate to require Morse proficiency in excess of the minimum required by our treaty obligations. A single 5 WPM code examination more than meets this criteria. If the Amateur Service did not exist and was being designed from "ground zero" today, it would not contain a Morse proficiency requirement at all.
- Perhaps our most compelling reason for wanting a single minimum speed Morse examination is that the mode is a barrier to fuller use of the Amateur Service ...and the higher the speed, the bigger the barrier.

4.) Written Examinations and License Preparation Material

VECs consider the license preparation publishers to be an important part of the VEC System and we work closely with them. It is very important that there be a smooth transition from the current system to a restructured Amateur Service. It takes time to develop question pools, print and distribute study material, implement new examinations ...and to sell out of existing training aids.

- The VEC System consists of approximately 35,000 VEs who are organized into about 2,000 VE teams. They are supervised by 14 Volunteer Examiner Coordinators (VECs). The question pools are revised on a four year cycle by the VECs internal Question Pool Committee (QPC). Since the Amateur community participates in the process, it takes more than a year to complete the question revisions, to get new study material in the marketplace and to introduce new examinations:

| | |
|----------------|--|
| February | New syllabus is published and new and revised questions are solicited. |
| July - October | QPC works on new question pool by e-mail. |
| December | Question pool is distributed to the public in digital form. |
| May | License preparation publishers must have new material in marketplace. |
| July 1 | Newly revised questions must be used in all examinations. |

| | | | | <u>Questions</u> | | | |
|--|----------------|--------------|------------------|----------------------|----------------------|-------------|-------------|
| ● Current question pool revision schedule: | | | | <u>Last Revision</u> | <u>Next Revision</u> | <u>Pool</u> | <u>Exam</u> |
| Element 2 | Novice | July 1, 1997 | July 1, 2001 | 480 | 35 | | |
| Element 3(A) | Technician | July 1, 1997 | July 1, 2001 | 386 | 30 | | |
| Element 3(B) | General Class | July 1, 1998 | July 1, 2002 | 440 | 30 | | |
| Element 4(A) | Advanced Class | July 1, 1995 | July 1, 1999 (*) | 580 | 50 | | |
| Element 4(B) | Extra Class | July 1, 1996 | July 1, 2000 (*) | <u>440</u> | <u>40</u> | | |
| (* = Revision has been put on "Hold" until license classes are resolved) | | | | 2326 | 185 | | |

| | | | | <u>Questions</u> | | | |
|---|-------------------|--------------|--------------|----------------------|----------------------|-------------|-------------|
| ● Proposed question pool revision schedule: | | | | <u>Last Revision</u> | <u>Next Revision</u> | <u>Pool</u> | <u>Exam</u> |
| Element 3(A) * | Novice/Technician | July 1, 1997 | July 1, 2001 | 500? | 50 | | |
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| Element 4 *** | Extra Class | July 1, 1996 | July 1, 2000 | <u>1000?</u> | <u>100</u> | | |
| | | | | 2000 | 200 | | |

(* = Pool would consist of merged old Element 2 and 3(A) VHF-oriented questions.)

** = Pool would consist of current Element 3(B) and eventually HF questions from Element 2.)

*** = Pool would consist of merged old Element 4(A) and 4(B) technically-oriented questions.)

The next QPC revision completed by QPC would be Element 4 which would be implemented 7/1/2000.

- It is important that the current license class names be retained rather than Class A, B, C or 1, 2, 3.
 - Training aids in the marketplace are identified by the current names. Any change will confuse examinees and adversely impact publishers and distributors who already have license preparation "on the shelves."
 - If the Novice and Advanced Class are phased out, these license classes will remain if renewed or modified. It is unwieldy to mix an old and new license class naming system.
 - Using same license class names would eliminate need to reissue licenses. If licenses were not reissued, it would take 12 years to phase out old license class naming system which is excessive and confusing.

5.) Mandating the general topics asked in written examinations.

The Commission asked for comment on whether the ten topics which must be asked in all written examinations should continued to be established in the rules. At present, the QPC must provide a bank of ten times as many questions as will appear on any examination.

- What is the primary interest of the Government in the examination process and in the licensing of amateur radio operators?
 - a. Is it to minimize interference to all users of the radio spectrum, protect health and to promote safety?
 - b. Or is it to introduce radio-related knowledge to the Amateur community much of which is not related to interference, health and safety.
 - c. Is it important to the Commission that all Amateur radio operators be knowledgeable in such topics as radio wave propagation, circuitry, equipment components, and so forth?
 - d. It seems that applicants increasingly want to use the ham bands for personal, public service and hobby-type communications among their friends, community and family — rather than as an educational vehicle to enhancing their electronics knowledge.

- The international law provides for “...self-training, intercommunication and technical investigation.” The required question topics in Amateur Service examinations are heavily weighted toward technical matters.

- We believe that the content of the question pools should be left up to the VECs Question Pool Committee. Some of the current topics fail to take changes over the years in operating habits, technology and transmitting equipment into consideration.

- For example, volunteer examiners are required to administer examinations to the Technician Class examinee which contain questions on electronic circuits even though all of the VHF/UHF/microwave handheld, mobile and fixed station transceivers used by Technicians today are purchased in the commercial marketplace. Questions on electronic circuitry are more appropriate for the higher class operator who is more inclined to experiment and to maintain/construct transmitting equipment. And most HF equipment is imported from off shore suppliers.

6.) Universal Licensing System

The VECs are still confused about the Universal Licensing System — when it will be implemented, the forms and filing procedures ...and how it will affect them.

- Amateur Service is already filing electronically. Any new system should closely mirror the existing system as much as possible. It must be emphasized that the VEC System is a volunteer operation and funds are not available for VECs to pay for costs associated with significant changes.
- The FCC provided electronic filing software to the VECs so that they could “batch file” applications. Will this be provided?
- Inputting applications one at a time via an online web-based form will not suffice. A provision must be made for a “batch filing” system.
- Most VECs have developed their own database systems in order to keep track of examinees and examination sessions. (VECs are routinely asked — such as for obtaining enforcement information — about examiners, examinees and exam sessions so these programs are necessary.) These systems are interfaced to electronic filing and to the FCC’s online database to insure accuracy. It is very important that this be taken into consideration.
- The Amateur community makes effective use of the online database that the FCC publishes to the Internet and updates daily. Several Amateur clubs and commercial companies have developed sophisticated online systems that make use of this database. It is very important that this feature be continued.
- Except on Vanity Call sign applications where there is a regulatory fee, we question the necessity of requiring a *Taxpayers Identification Number* (Social Security Number) on the proposed application Form 605. The reason given by the Commission for the necessity to collect the SSN is that it is required by the *Debt Collection Act* to facilitate collection of delinquent debts. The Amateur Service does not have an application fee, therefore funds are not involved.
- We believe the “key” should be the applicant’s call sign rather than the SSN. Foreign nationals - which can be — and are — licensed as radio amateurs - do not have SSNs.
- The VECs should work close with the Commission’s Universal Licensing System. No one from ULS has contacted the VECs regarding an implementation schedule -- or their needs and concerns.
- It is very important that all amendments to Amateur Service license classes, qualifying examinations and the Morse code waiver system be adopted and implemented prior to developing Universal Licensing System processes for the Amateur Service. This will eliminate having to again modify ULS to coincide with these changes.