

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of) **WT Docket No. 98-143**
)
1998 Biennial Regulatory Review - -)
Amendment of Part 97 of the Commission's)
Amateur Service Rules.)

To: The Commission

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**Comments of the Southern California Repeater and Remote Base
Association**
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Southern California Repeater and Remote Base Association
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December 1, 1998

EXECUTIVE SUMMARY

The Southern California Repeater and Remote Base Association (SCRRBA) hereby provides comments to the Federal Communications Commission (Commission) Notice of Proposed Rule Making number WT Docket No. 98-143 that proposes changes to the Amateur Radio Service (ARS) in concert with the 1998 Biennial Regulatory Review – amendment of Part 97 of the Commission’s Amateur Service Rules.

SCRRBA provides input as to the Commissions proposed changes to the ARS licensing structure and also proposes amendments to the rules and regulations as to the Commissions request for information and comments as to ideas for improving their enforcement processes as they relate to amateur radio.

SCRRBA does not opposed the reduction of new offered licenses to the ARS service from 6 to 4 but argues the point that the existing licenses classes (6 total) should be retained in order to properly reflect the actual achievements by each of these classes of license.

SCRRBA proposes rules amendments, changes, and/ or additions that reduce ambiguity and provide responsibility and credibility that will reduce the Commissions involvement in enforcement issues that result from ARS frequency coordination issues and activities. The current Part 97 rules do not provide the tools necessary for the ARS to become more self sufficient and therefore more self policing, in the area of frequency coordination. In order for the Commission to continue to follow the present mandate from the Congress to further reduce government oversight and involvement it is necessary to refine Part 97. With the addition of these new tools the Commission will require less involvement with enforcement matters as to the ARS.

COMMENTS

1. The Southern California Repeater and Remote Base Association (SCRRBA) is a voluntary association of owners and operators of Amateur Radio Service fixed and mobile relay stations operating primarily on the VHF, UHF, and Microwave Frequency amateur bands. SCRRBA (including its predecessor, the California Amateur Relay Council [CARC]) has provided voluntary frequency coordination for these activities since 1970. SCRRBA is a full member of the National Frequency Coordinators Council (NFCC). SCRRBA has actively participated in numerous Federal Communications Commission rule making proceedings pertinent to our activities.
2. SCRRBA currently maintains over 2,400 frequency coordination records. These data represent the activities of the mobile and fixed relay type amateur radio systems in Southern California. These systems operate on the HF (29.5-29.7 MHz), VHF (51-54 MHz), UHF (420 – 450 MHz) and all higher amateur frequency bands. These systems each have an average membership of about 45 amateurs. The largest of these systems has a membership exceeding 1,300.
3. SCRRBA is an active participant (usually the sponsor) in the amateur band planning process. We represent the fixed and mobile relay interests in regional band planning meetings. These meetings occur when the existing plans do not cover a desired activity, or when they need to be upgraded to match new or increased activities. These meetings are attended by representatives of ALL the amateur uses of the band within the geographical region. These band plans are adopted by unanimous consent of these representatives. These band plans cover activity in the Southern California geographical region. Whenever we adopt a new band plan for our region, we submit it to the American Radio Relay League, Inc. (ARRL), and the National Frequency Coordinators Council (NFCC), to be included in national band planning efforts.
4. The members of SCRRBA are clubs, organizations, and individual amateurs who construct and operate mobile and fixed relay amateur systems. These systems generally are available for normal operation 24 hours a day and are generally used for continuous on-going daily communications rather than the intermittent or random nature of HF communications more often associated with Amateur Radio operations.
5. Various types of communications and control data are sent over these systems. The members of most systems are “control” operators who are able to configure their system to meet any particular operational need. These systems, and the tools and

skills residing within our membership provide a huge resource of communications capability.

6. This resource is regularly tapped to provide many different types of public service communications. This resource is of tremendous value in an emergency. These Amateur Radio systems often have a service area that extends throughout the Southern California area and into neighboring states. This capability allows us to provide public service communications into and out of a disaster area when the commercial systems are not functioning.

7. These same amateurs and systems are also a huge resource of supplemental communications capability commonly used for official and or public support during any number of scheduled public events, from parades to off road desert races to marathons to beach cleanup events.

8. While SCRRBA as an organization primarily performs coordination and deals with spectrum issues above 29.5 MHz it's members posses all classes of ARS licenses and therefor wish to offer their comments as to the new proposed licensing structure. These comments were formulated at the last SCRRBA General Membership meeting of October 17, 1998 with members present representing the majority of the individuals, systems, and organizations that operate VHF, UHF, and higher band systems coordinated by SCRRBA. In fact, the membership at this meeting voted and directed the SCRRBA officers to prepare and provide these comments to the Commission.

9. SCRRBA members are not opposed to the elimination of the offering of new Technician Plus or Novice class licenses. However SCRRBA members are opposed to any elimination of these licenses to their existing holders. The current holders should be allowed to continue with that privilege and maintain the existing license, with renewals and be allow to make their own decision as to any upgrade and or to leave the service. The current license holders should not be forced to take additional exams etc. at the Commissions request to simply eliminate a few sections of the rules. SCRRBA is opposed to the replacement of any such licenses with some license that reflects lessor privileges and/ or examination requirements or credits.

10. Many SCRRBA members have been in the Telecommunications industry long enough to have suffered through the Commissions past practices such as with the elimination of the First Class Radio Telephone licenses. All prior First Class Radio Telephone licensee had there licenses discontinued and were only offered a General Radio Telephone Licenses which represented a lower grade of license and achievement, somewhat equivalent to the lessor grade of a Second Class Radio Telephone licensee, as a renewal license. No offering of proof of prior 1st Phone Licenses were provided to these holders. The burden of proof that an individual has previously held a 1st Phone now solely rests with that person.

11. SCRRBA requests that the Commission must also address the problem associated with the burden of proof for a prior license class and or exams passed. Currently, and it would appear that in the future the Commission is requiring that such proof should be carried in addition to the current Commission issued license. ARS Licensee should not be required to both protect and archive past licenses in order to show proof of prior classes held and/ or elements passed. The Commissions printed license should show all prior credits and/ or achievements. SCRRBA question as to what good a licensing document is if it does not reflect the actual privileges and past achievements of the bearer. It appears to be self defeating if it is necessary to possess and archive prior licenses and other documents to show actual privileges, etc.

12. The concept of a Commission license carrying proof of prior discontinued licenses is not a new concept. The commission has provided just such a service for ARS licensee before. From before world war II to after and into the early 1950's changes were made to the service class of licenses basically going from a system of Class C, B & A to the Novice, Technician, General, and Extra Class. The Commission allowed prior holders of Class A licenses to maintain these and renewed them even though there was no such class of license to fill the void. The Commission then later adopted an additional class of license, the Advanced class, which did allow transitions of the Class A licenses in the 1960's.

13. The unfair problem that many ARS licensees sometime face with these elimination's by acting Commission Staffs is that they simply outlive different era's and Commission Staffs that make changes that are sometimes totally divergent to each other. Simply put, an ARS licensee should not bare the burden for instant changes done by different eras and/ or staffs of the Commission.

14. SCRRBA therefore requests that the present Novice and Technician Class licenses be retained and renewable for those holders while the Commission may cease to offer new ARS licenses of these classes. This is the simplest and best method of recognition and proof of actual licensing and achievements for these licensee holders.

SCRRBA requests that the following Part 97 rules be not changed as proposed and/or they be corrected to reflect the above arguments:

- 97.9(a) DO NOT CHANGE AS PROPOSED
- 97.9(b) DO NOT CHANGE AS PROPOSED
- 97.21(3) DO NOT CHANGE AS PROPOSED
- 97.301(a) DO NOT CHANGE AS PROPOSED
- 97.301(e) CORRECT AS PER BELOW

97.301(e) For a station having a control operator who has been granted an operator license of Novice, Technician Plus, or Technician Class **and who has received credit for proficiency in telegraphy in accordance with the international requirements (Element 1(A), 1(B) or 1(C))**:

SCRRBA wishes to also point out that a unrelated section of the proposed rule changes contains what appears to be two typo type omission and should be corrected as below:

97.313(f) NEEDS CORRECTION TO PROPOSED TEXT as shown in the 98-143 Errata adopted August 31, 1998 version that SCRRBA has viewed.

97.313 (f) No station.....2.106 of **this part** the FCC Rules, unless.....the **District Director** EIC of the.....lower half-power (- 3-dB relative.....than 10°.

The commission has shown the removal of the following words “power” & “3” following the words “The transmitting antenna elevation angle between the lower half” and preceding the words “dB relative to the peak or antenna bore sight)” thusly rendering the parameter and statement meaningless. SCRRBA asks that the Commission please review these statements carefully for incorrect and missing language.

15. At item number 4 in the NPRM the commission has asked:

“4. We seek comment on ideas for improving our enforcement processes as they relate to amateur radio.”

Over the many years that SCRRBA has been involved in VHF/ UHF activities it has noted that the Commission, generally at the local level in the past with the Engineer In Charge (EIC) and his and/ or her staff, but not entirely limited to the local level, have been involved in and/ or requested to provide input to, decisions, Rule and Regulations interpretation and/ or to referee matters that involved ARS frequency coordination. While some of these issues have become public record as noted in some of the ARS media publications and are thusly well known, however, a lot of the issues that SCRRBA is familiar with are quite local in nature and have only involved the local EIC and have not showed up in the ARS media.

16. Many of these matters have directly or indirectly involved enforcement problems and/ or issues. Thusly SCRRBA feels that with the Commissions invite for information as to what it might do to better improve enforcement procedures should take a look at the present Part 97 rules with the intent of providing for more “self enforcement and self policing by the ARS”. SCRRBA wishes to assist with this

effort by providing Rule amendments and changes which are provided in Appendix A of this filing. These changes will serve to better define, formulate, and provide for ARS frequency coordination which will further remove the Commission from involvement with normal “day-to-day” ARS activities thusly reducing Commission enforcement involvement with the ARS.

17. ARS Frequency coordination has matured to both extent and practice where mere peer pressure and gentleman’s agreements have long outlived their usefulness. This is especially true in such large urban areas as Southern California. As the Commission is well aware many disputes have erupted in various areas of the country with these frequency-coordination matters that eventually have involved the EIC and their staffs. Participation has varied from EIC area to area and treatment has also varied with differing interpretations of part 97 as it applies to frequency coordination.

18. The ARS community and its frequency coordinators have long recognized that the present Part 97 rules are far from adequate and in fact quite vague as to frequency coordination matters and/ or support thereof. Frequency coordination is only mentioned and or briefly referred to in a total of three sections in Part 97: 97.3(a)(21), 97.201(c), & 97.205(c). The first as a definition, and the second and third as to interference between like classes of stations, auxiliary to auxiliary stations and repeater to repeater stations. Therefor this NPRM is an opportune time to address both issues, ARS coordination and Commission enforcement processes with the intent of reducing the Commissions involvement in matters that should be only everyday issues within the ARS community.

19. The ARS lacks the ability to perform self coordination with the same ability as the equivalent commercial services. The commercial services have the luxury of a coordination process that leads directly to an exact Commission issued license for very specific parameters of operation. Since the ARS does not share the same licensing activity its coordination procedures needs to suffice both requirements. The current part 97 rules fall far short of allowing the ARS to move forward and become more self policing. This is a predicament where some additional rules will both allow the ARS to become more independent and self policing but will also allow the Commission to reduce its need for attention to the service thusly allowing the ARS to help share the burden of the service.

20. To this process and with the experience that SCRRBA has acquired over the many years it has provided frequency coordination in Southern California (created in 1976 by prior members of the California Amateur Relay Council which dates back to the 1960’s) it has become abundantly clear that changes to ARS rules are both necessary and required in order for the service to continue into the next century with less involvement by the Commission. With Part 97 coordination rule

changes the process of ARS coordination should become less burdensome upon the commission and far more productive within the ARS community.

21. To this issue SCRRBA provides the proposed changes to the Part 97 rules as shown in Appendix A. These regulation changes will provide improvement to the enforcement process of the commission. The rule amendments and changes are directed and focus around the following premises that are of interest to ARS:

a. To provide further refined recognition of ARS frequency co-ordination. Currently ARS frequency coordination is only mentioned in passing in reference to the definition of a frequency coordinator 97.3(a)(21) and as to interference between Repeater stations 97.205(c) and between auxiliary stations 97.201(c).

b. To provide accreditation of coordinators. The issue of accountability of frequency coordinators is one that has arisen many, many times and is settled by providing an overall accreditation and dispute handling organization. This organization would be the NFCC. The NFCC by-laws are included as Appendix B along with the recently approved Standards as Appendix C of this filing. By requiring accreditation for frequency coordinators we have added another level of self policing and provided further removal of the Commission from ARS in-house disputes.

c. To provide for only one coordinator per (sub)band per geographic area. This is to eliminate once and for all the basis of many, many coordination disputes by only allowing one a single coordinator per (sub)band per area. SCRRBA has learned from experience and actual applications that when combined with the ARS manpower and experience available and the required tasks to be performed it is counterproductive to allow for more than one coordinator per (sub)band per geographic area. While some will argue the case for more than one coordinator per band and/or area the disputes that have resulted from this method are born out by prior attempts within the service to do this. To SCRRBA's knowledge, none of the multiple coordinator organizations have either succeeded and or been successful. These attempts at multiple coordination efforts have only succeeded with disruption to the ARS service and burdensome involvement by the Commission.

While not the exact same activity and or methodology the parallel may be drawn from the commercial radio services that have had, and still have multiple coordinators. The Commission has recognized the impracticability of this method and has been slowly working with the commercial community to reduce the multiplicity of coordinators. Allowing only a single coordinator forces the community to work together, to both deal with and to resolve it's own issues. It is a far more practical methodology.

d. To establish primary operation for coordinated stations in the ARS service. Primary operation is merely the final recognition of what in fact already exists. It is an established fact of Physics that more than one transmitting station cannot occupy the same frequency and coverage area at the same time. Based on this premise and the desire of the ARS community to set aside certain frequencies for certain Auxiliary and/ or Repeater station operations through the coordination process the ARS community has by default created different levels of operation. To finally recognize this operation as primary is merely the natural next step in solidifying the frequency coordination practice and provides further protection to coordinated stations.

e. To require frequency co-ordination within those ARS communities that have adopted coordination for repeaters, auxiliary, and message forwarding stations (at certain locations only). If the working majority of the ARS community in a geographic area have recognized the merits of frequency coordination and established the practice it becomes imperative that the process be complete. In such heavily populated Urban areas such as Southern California where the greater ARS community has established the process of coordination it serves no purpose and only becomes a time sink, and an unending area of dispute etc. to continually have to correct problems that arise from amateurs who choose to not participate utilizing the current peer pressure system. Making the process a requirement for station operation where coordination is established simply serves to end the continuous dispute of exactly what is required to place an Auxiliary, Repeater, and/or certain Message Forwarding stations in operation. The reward for stations that are coordinated is protection, they are primary for their frequencies and areas of operation.

However, there still exist areas within the continental US, Alaska, Hawaii, and the US possessions that may not find the need and/ or requirement for frequency coordination, and that is OK. Such areas might also include rural areas or regions of sparse ARS populations. These areas, that find they have no problems and/ or need to formally establish the frequency coordination process need not do this. Frequency coordination is to be self determined by the areas in question, not mandated, but it must be provided for.

f. To refine interference responsibility and better define the cure burden. The current Part 97 only address interference between like station operations, i.e. Repeater to Repeater station or Auxiliary to Auxiliary station, and does not address Message Forwarding stations. Part 97 is in need of expansion to address interference issues between any one of these stations.

g. To establish band planing and to allow local plans to always take precedence over any national and/ or regional plans. Band planning is a requirement for good coordination practices and is a necessity in large Urban areas such as Southern California between all the modes, emissions and operation types that may be found on any ARS VHF, UHF, and microwave band. This rule change is to simply recognize formally and call for the practice of band planing while requiring the participation of all modes, emissions, and operations types to the process. An individual coordinator or coordination organization does not do band planning for his or her ARS community, this is an overall local ARS community responsibility and process. All band planning should always take into account spectrum that may be influenced by surrounding areas and/ or require national agreement do to propagation or regulatory issues. However, it is not a necessity to require spectrum that does not share propagation issues or special regulatory requirements to have to conform to the same parameters, etc. that may be found in other distant areas or regions of the country.

h. To formally establish a co-ordination Single-Point-of-Contact (SPOC) between the FCC and the ARS coordination community. This rule causes the ARS frequency coordination community to be focused with its contact with the Commission and provides a more meaningful methodology for the Commission to deal with ARS coordination matters. The majority of the ARS frequency coordination community has either become a member of, or at least recognizes such an organization, the National Frequency Coordinators Council, which was formed in 1996 for just this purpose. Please see the By-laws of the NFCC attached as Appendix B to these comments.

22. The following are the sections of the Part 97 rules and regulations that SCRRBA proposes for amendment, change and/ or addition:

Subpart A - General Provisions

Definitions. - 97.3(a)(XX)

(21) Frequency coordinator. [rewritten]

(xx) Coordinated station. [new]

(xx) Coordination Single-Point-of-Contact. [new]

(xx) Message forwarding station. [new]

(xx) Communication site. [new]

(xx) Primary operations. [new]

Subpart B - Station Operation Standards

General standards. - 97.101(b) [rewritten]

Subpart C - Special Operations

Auxiliary station interference - 97.201(c) [rewritten]

Auxiliary station coordination - 97.201(f) [new]
Repeater station interference - 97.205(c) [rewritten]
Repeater station coordination - 97.205(h) [new]
Message forwarding station interference - 97.219(e) [new]
Message forwarding station non-coordinated - 97.219(f) [new]
Message forwarding station coordination - 97.219(g) [new]
Coordinated station operation - 97.220 [new]

Subpart G - Frequency Coordination [new]

Frequency coordinators - 97.601
Duties - 97.603
Requirements and Qualifications - 97.605
Accreditation - 97.607
SPOC - 97.611
Band Plans - 97.613

23. SCRRBA offers the following as both explanation and insight to each of the particular amendments, changes and/ or additions that it has propose to the Part 97 Rules:

24. Subpart A - General Provisions

Definitions. - 97.3(a)(XX) Frequency coordinator. [rewritten]

This section is rewritten to better define who a frequency coordinator is and what they do. Introduces the concept of primary basis, i.e. primary operations to better define the fundamental use and reservation of particular frequencies for particular service.

25. Coordinated station. [new]

This section adds the definition of a coordinated station to show ownership of a coordination and also specifically limits coordination to three types of ARS stations.

26. Coordination Single-Point-of-Contact. [new]

This definition introduces the concept of an interface between the ARS frequency coordination community and the Commission. This is the purpose of the NFCC. This organization, or SPOC, shall function under a MOU as to it's activities and responsibilities between the ARS coordination community and the Commission.

27. Message forwarding station. [new]

This section introduces the individual message forwarding station which is the third type of ARS station, that under certain conditions requires coordination. It should also be noted that this station type is defined by “operation technique” and is not emission specific.

28. Communication site. [new]

This section adds the definition of a communications site to specifically address message forwarding stations that require coordination. It has become evident to SCRRBA that when message forwarding stations are co-located at communications sites (locations that house large concentrations of radio frequency hardware and/ or sites that have large coverage areas) it becomes necessary to set the parameters of operation for these stations. It is necessary with these message forwarding stations to both address and eliminate interference to co-located equipment (same site) and to co-channel and/ or adjacent channel operations within the larger coverage areas.

29. Primary operations. [new]

This section adds the definition of and provides the proper level of recognition within the ARS community to coordinated operations. This definitions also serves to establish that all other operations on the specific spectrum in question are considered secondary.

30. Subpart B - Station Operation Standards

General standards. - 97.101(b) [rewritten]

This section is rewritten to better reflect the necessity for cooperation within the ARS community as to frequency coordination. Also this section further establishes the premise of primary operations to stations that have been coordinated by a frequency coordinator.

31. Subpart C - Special Operations

Auxiliary station interference - 97.201(c) [rewritten]

This section is rewritten to better establish the responsibility for interference resolution between the classes of coordinated stations and uncoordinated stations.

32. Auxiliary station coordination - 97.201(f) [new]

This section establishes the requirement for coordinated for any operation in any areas that have established coordination. However, it still allows for operation in areas that do not find it necessary to establish coordination.

33. Repeater station interference - 97.205(c) [rewritten]

This section is rewritten to better establish the responsibility for interference resolution between the classes of coordinated stations and uncoordinated stations.

34. Repeater station coordination - 97.205(h) [new]

This section establishes the requirement for coordinated for any operation in any areas that have established coordination. However, it still allows for operation in areas that do not find it necessary to establish coordination.

35. Message forwarding station interference - 97.219(e) [new]

This section is added to establish the responsibility for interference resolution between the classes of coordinated stations and uncoordinated stations.

36. Message forwarding station non-coordinated - 97.219(f)

This section allows the establishment of stations without coordination that are not at communication sites in any area that has established coordination.

37. Message forwarding station coordination - 97.219(g) [new]

This section establishes the requirement for coordinated for any operation at communication sites in any areas that have established coordination. However, it still allows for operation in areas that do not find it necessary to establish coordination.

38. Coordinated station operation - 97.220 [new]

This section establishes protection for coordinated operations. All operations on a coordinated frequency(s) within it's service area other than those by the coordinated station are secondary.

39. **Subpart G - Frequency Coordination** [new]

This subpart has been created to address frequency coordination.

40. Frequency coordinators - 97.601

This section establishes frequency coordination within the local ARS community when that community deems it both necessary advantageous.

41. Duties - 97.603

This section sets the minimum required duties for and what information is to be disseminated by frequency coordinators.

42. Requirements and Qualifications - 97.605

This section sets the minimum requirements and qualifications for frequency coordinators.

43. Accreditation - 97.607

This section establishes who will accredit frequency coordinators.

44. SPOC - 97.611

This section establishes the requirement for the ARS Community to establish a SPOC who will enter into a MOU with the Commission and who will become the highest level of arbitration/ resolution within the ARS community as to frequency coordination matters.

45. Band Plans - 97.613

This section establishes (sub)band planning within the ARS Community. It requires that band plans are to be the product of representatives of all applicable modes and services within the spectrum and geographic area in question and should accommodate, as much as possible, any national and/ or region wide plans. This section also establishes the premise that local band plans take precedence over any national and or region wide plans

CONCLUSION

Therefore, for the above reasons, SCRRBA asks the Commission to not incorporate any ARS licensing changes that will cause any licensee to lose any privileges or be required to save and protect beyond the term of any license document proof of prior commission eliminated class of licenses. Per the Commission's request for input on how it can improve its enforcement process SCRRBA also proposes that the Commission adopt certain rule changes and regulations that better support and provide for Amateur Radio Service frequency coordination.

Respectively submitted,

**The Southern California Repeater
and Remote Base Association**

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APPENDIX A

SCRRBA proposes that the Commission amend Part 97 of Chapter I of Title 47 of the Code of Federal Regulations to read as follows:

97.3 Definitions.

97.3(a)(21) *Frequency coordinator.* A person, persons, and/ or organization, which coordinates frequencies and associated technical and operating parameters for auxiliary, repeater, and/ or message forwarding stations for use on a primary basis.

97.3(a)(xx) *Coordinated station.* A station in auxiliary, repeater, or message forwarding operation which is utilizing frequencies and operating parameters specified by a frequency coordinator.

97.3(a)(xx) *Coordination Single-Point-of-Contact.* A single organization, group, persons and or person which is recognized by both the FCC and the ARS coordination community as the Single-Point-of-Contact (SPOC) between the respective parties.

97.3(a)(xx) *Message forwarding station.* An individual station participating with a group of similar stations to form a message forwarding system.

97.3(a)(xx) *Communication site.* Any site that may contain co-located HF band (above 25 MHz), VHF, UHF, or SHF radio frequency communication equipment that has been established, usually at elevated land location and/ or with elevated antenna tower(s) for the purposes of providing extended communications service.

97.3(a)(xx) *Primary operations* Amateur radio auxiliary, repeater, and/or message forwarding station operations which utilize frequencies coordinated by a frequency coordinator. Other operations on such frequencies within the coordinated service area are secondary.

97.101 General Standards.

97.101(b) Each station licensee and each control operator must cooperate with each other and with a frequency coordinator (if one exists), in selecting transmitting frequencies and associated technical and operating parameters and in making the

most effective use of the amateur service frequencies. No frequency will be assigned for the exclusive use of any station. A station which has been coordinated by a coordinator may utilize its frequencies on a primary amateur service basis.

SUBPART C - SPECIAL OPERATIONS

97.201 Auxiliary station.

97.201(c) Where the transmissions of an auxiliary station causes harmful interference to another auxiliary, repeater, and/ or message forwarding station the licensees are equally and fully responsible for resolving the interference unless one station's operation is coordinated by a frequency coordinator and the other station's is not. In that case, the licensee of the non-coordinated auxiliary station has primary responsibility to resolve the interference.

97.201(f) Before establishing an auxiliary station the licensee must obtain frequency coordination from a coordinator (if one exists), for the band and geographic area of operation. Before changing the location, transmit/receive frequencies, and/or other parameters as specified by the frequency coordinator (if one exists), the licensee must obtain new frequency coordination.

97.205 Repeater station.

97.205(c) Where the transmissions of a repeater station cause harmful interference to another auxiliary, repeater, and/ or message forwarding station the licensees are equally and fully responsible for resolving the interference unless the operation of one station is coordinated by a frequency coordinator and the operation of the other station is not. In that case, the licensee of the non-coordinated repeater station has primary responsibility to resolve the interference.

97.205(h) Before establishing a repeater station the licensee must obtain frequency coordination from a coordinator (if one exists), for the band and the geographic area of operation. Before changing the location, transmit/receive frequencies, and/or other parameters as specified by the frequency coordinator (if one exists), the licensee must obtain new frequency coordination.

97.219 Message forwarding system.

97.219(e) Where the transmissions of a message forwarding station cause harmful interference to another auxiliary, repeater, and/or message forwarding station, the licensees are equally and fully responsible for resolving the interference unless the operation of one station is coordinated by a frequency coordinator and the operation of the other station is not. In that case, the licensee of the non-coordinated message forwarding station has primary responsibility to resolve the interference.

97.219(f) Message forwarding stations may be established without coordination except as noted in (g) of this section.

97.219(g) Before establishing a message forwarding station at a communications site and/or other sites as specified by a frequency coordinator (if one exists), the licensee must obtain frequency coordination for the band and the geographic area of operation. Before changing the transmit/receive frequencies, and/or other parameters as specified by the frequency coordinator (if one exists), the licensee must obtain new frequency coordination.

97.220 Coordinated station operation.

Except for operations under 97.101(c), use of frequencies coordinated to an auxiliary, repeater, and/or message forwarding station by other amateur stations within the coordinated service area shall be on a secondary basis.

SUBPART G - FREQUENCY COORDINATION

97.601 Frequency coordination.

The auxiliary, repeater, and message forwarding station community shall establish frequency coordinators when deemed necessary and advantageous to coordinate transmit/receive frequencies and associated technical and operating parameters for such stations.

97.603 Frequency coordinator duties.

- (a) The frequency coordinator shall coordinate transmit/receive frequencies and associated technical and operating parameters for auxiliary, repeater, and/or message forwarding stations. in conformance with local band plans.
- (b) The coordinator must distribute to the community the following information:
 - (1) An exact description of the geographical area and the frequency bands for which it performs coordination.
 - (2) A description of the band utilization plan(s) for each amateur frequency band within which it provides frequency coordination.
 - (3) A description of the application process by which coordination for a station in auxiliary, repeater, and/or message forwarding operation may be requested.
 - (4) A description of the process by which appeals of coordination decisions may be filed, and the subsequent resolution process which will be followed.

97.605 Coordinator requirements and qualifications.

- (a) No organization or individual may serve as a coordinator unless a written agreement has been entered into with the coordination SPOC.
- (b) A coordinator must be recognized in a local or regional area by amateur operators whose stations are eligible to be coordinated auxiliary, repeater, and/or message forwarding stations.
- (c) A coordinator may be an individual, public, or private organization. All persons serving as a coordinator, whether individually, or as members of an organization, shall have their principal residence within the geographic area of service of the coordinator, be at least 18 years of age, and hold a Technician or higher class license.
- (d) No person may be a coordinator if that person's amateur station license or amateur operator license has ever been revoked or suspended.
- (f) There shall be only one coordinator for each amateur service frequency band within a geographical area. The same coordinator may provide coordination service for more than one frequency band in a geographical area.

97.607 Coordinator accreditation.

The SPOC shall accredit coordinators.

97.611 SPOC.

The ARS coordinator community shall provide a coordinator Single-Point-of-Contact with the FCC. The FCC and the SPOC shall enter into a Memorandum-of-Understanding (MOU) between the respective parties as to ARS frequency coordination matters and methods. The SPOC shall be the highest level of frequency coordination conflict arbitration/resolution for auxiliary, repeater, or message forwarding stations within the ARS community.

97.613 Band plans.

A band plan shall be employed for an area of interest when the ARS community representatives of all applicable modes and services within a (sub)band have agreed and adopted such a plan. Local area band plans, where possible, shall conform to and/ or accommodate any national and/ or region wide plans, however local plans shall always take precedence over any national and/ or region wide plans.

APPENDIX B

The by-laws of the National Frequency Coordinators Council:

- B1 :
- B2 : Bylaws of the National
- B3 : Frequency Coordinators' Council, Inc.
- B4 : (rev: April 20, 1996, January 14, 1998)
- B5 :
- B6 : Article I. Name
- B7 :
- B8 : The name of the corporation is National Frequency
- B9 : Coordinators' Council, Inc., (NFCC), a corporation pursuant
- B10 : to the District of Columbia Non-profit Corporation Act.
- B11 :
- B12 : Article II. Purposes
- B13 :
- B14 : The purpose for which the corporation is organized is to
- B15 : establish recognition of Amateur Radio frequency
- B16 : coordination by the Federal Communications Commission, the
- B17 : American Radio Relay League, and all Amateur Radio
- B18 : licensees. This goal is to be fulfilled by the Corporation
- B19 : by the following activities:
- B20 :
- B21 : (1) To facilitate the exchange of information and general
- B22 : cooperation between members, the Federal Communications
- B23 : Commission (FCC), the American Radio Relay League, Inc.
- B24 : (ARRL), and any other legislative or regulatory arm of the
- B25 : Federal government pertaining to the Amateur Radio Service,
- B26 : and specifically the coordinated use of repeaters and other
- B27 : relay devices and systems, and amateur stations using shared
- B28 : bands utilized by fixed-station repeater and relay devices
- B29 : and systems. Such information would include such things as
- B30 : lists of frequency coordinators; proposed and current
- B31 : policies, procedures and regulations pertaining to
- B32 : coordinator certification, decertification, and succession
- B33 : of coordinators; proposed and current federal policies
- B34 : affecting Amateur Radio systems operations; pending and
- B35 : current FCC submissions and determinations, including
- B36 : Petitions for Rule Making, Notices of Proposed Rule Making,

B37 : and Report and Order releases affecting Amateur Radio
B38 : repeater and relay systems and the cooperative coordination
B39 : of the same for interference avoidance.
B40 :
B41 : (2) To operate as, or to facilitate, a
B42 : Single-Point-Of-Contact (SPOC) between the FCC and the
B43 : Amateur Radio frequency coordinating community.
B44 :
B45 : (3) To promote responsible coordination of the use of
B46 : Amateur Radio operations in FCC-authorized HF, VHF, UHF, and
B47 : SHF frequency sub-bands and promulgate proper policies for
B48 : cooperation and interference avoidance among and between
B49 : users.
B50 :
B51 : (4) To facilitate arbitration of disputes involving Amateur
B52 : Radio frequency coordination. This will be accomplished by
B53 : encouraging local resolution of disputes as well as
B54 : appointment of arbitrators to conduct binding arbitration in
B55 : accordance with the American Board of Arbitration
B56 : procedures; the costs of such to be borne by the parties to
B57 : the arbitration.
B58 :
B59 : (5) The corporation will define a frequency coordinator in
B60 : such a way as to address issues of succession, recognition,
B61 : certification and geographic exclusivity within the bands
B62 : coordinated, so as to have a recognized coordinator within
B63 : each geographic area responsible for usage of the allocated
B64 : spectrum. This may include separate coordinators for the
B65 : various emission types authorized within the area. The
B66 : corporation will establish standards for performing the
B67 : coordination task. It will, using those standards, certify
B68 : and decertify coordinators to assure continuity and
B69 : capability in the performance of the duties of the
B70 : coordinators.
B71 :
B72 : Article III. Membership
B73 :
B74 : Section 1. Qualifications.
B75 :
B76 : Any recognized state coordination councils, state
B77 : organizations, regional coordination councils, or individual
B78 : state-wide or regional coordinators currently coordinating
B79 : use of Amateur Radio frequencies above 29 MHz and listed in
B80 : the 1995/1996 ARRL Repeater Directory are qualified to be

B81 : charter members of the NFCC. In addition, digital
B82 : coordinating entities who perform coordination of auxiliary,
B83 : repeater or simplex Amateur Radio frequencies above 29 MHz,
B84 : and who are listed in the 1995/1996 ARRL Repeater Directory,
B85 : are qualified to be charter NFCC members. Any other
B86 : frequency coordination entity that is mutually recognized by
B87 : neighboring NFCC members and follows approved NFCC
B88 : guidelines and policies for coordination procedures and
B89 : coordinator succession shall be qualified for membership in
B90 : the NFCC after it has been established.
B91 :
B92 : Section 2. Membership Approval.
B93 :
B94 : Charter membership approval shall be considered to be
B95 : reciprocally granted by all ratifying NFCC members. All
B96 : subsequent applications for membership must be approved by
B97 : the Board of Directors, known as the NFCB, and ratified by a
B98 : vote of not less than 2/3 (66.7%) of the voting NFCC
B99 : membership.
B100 :
B101 : Article IV. Board of Directors
B102 :
B103 : Section 1. Election.
B104 :
B105 : (a) The Board of Directors shall consist of five (5)
B106 : delegates of NFCC representing voting members. Directors
B107 : shall serve non-concurrent two-year terms, with no more than
B108 : three (3) directors being elected in any given year.
B109 : Vacancies on the Board of Directors will be filled by the
B110 : President, as set forth below in Section 4 of this Article.
B111 : If a Director ceases to be a delegate of a member entity or
B112 : himself or herself ceases to be a member during his or her
B113 : tenure as Director, then eligibility to serve as a Director
B114 : ceases and that Director must immediately resign.
B115 :
B116 : (b) The initial election of Directors shall be done by means
B117 : of a single election for all Director seats. Thereafter,
B118 : elections will be staggered. The three Directors receiving
B119 : the most votes in the initial election shall serve two year
B120 : terms; the remaining two shall serve one year terms.
B121 : Thereafter, all directors shall serve two-year terms.
B122 :
B123 : (c) Election of Directors shall occur on September first of
B124 : each year. Voting shall be by electronic ballot, except

B125 : timely mail ballots shall be accepted. Should an annual
B126 : meeting of the Membership occur within the 30 days
B127 : preceding September first, election of the Board of
B128 : Directors shall occur at that meeting. Ballots shall be
B129 : mailed only to members without electronic mail. Ballots
B130 : shall be sent electronically, together with a manual return
B131 : receipt request to all voting members not less than 30 days
B132 : in advance of the election, whether such election is
B133 : electronic or held at an annual meeting. Ballots received by
B134 : the day of the election shall be tallied, and results shall
B135 : be posted on the ARRL NRDB BBS and the National
B136 : Coordinators' Internet Re-Mailer within five (5) days
B137 : thereafter. In the event of a tie vote, a run-off election
B138 : shall be completed no later than thirty (30) days thereafter.
B139 :
B140 : (d) Installation of newly elected directors shall take
B141 : effect immediately after the election, with the official
B142 : posting of election results by the President.
B143 :
B144 : (e) The Board may in its discretion, by majority vote, defer
B145 : for determination or decision to the Membership of the NFCC,
B146 : by mail or electronic ballot, any proposal which properly
B147 : comes before the Board. Any such decision to defer an issue
B148 : is binding on the Board of Directors, and that issue may not
B149 : again be brought to the Board of Directors until acted upon
B150 : by Membership vote.
B151 :
B152 :
B153 : Section 2. Chairman of the Board of Directors.
B154 :
B155 : (a) The Chairman of the Board of Directors is elected for a
B156 : one-year term of office (not to exceed six consecutive terms
B157 : in that capacity) by the elected Directors.
B158 :
B159 : (b) The Chairman shall preside at all meetings of the Board
B160 : unless absent or incapacitated. In this case the Vice
B161 : Chairman will preside.
B162 :
B163 : (c) The Chairman shall appoint all committees, with the
B164 : advice and consent of the Board.
B165 :
B166 : (d) The Chairman shall enforce due observance of these
B167 : Bylaws, and shall perform all other customary lawful duties
B168 : pertaining to the office of Chairman of the Board.

B169 :
B170 : (e) The Chairman shall be responsible for the establishment
B171 : and management of the National Frequency Coordinators'
B172 : Office (NFCO).
B173 :
B174 : (f) The Chairman shall publish an annual report to the NFCC,
B175 : with copies provided to the ARRL Board of Directors. This
B176 : report, as a minimum, shall enumerate the services provided
B177 : by the NFCO and the actions taken by the Board and the
B178 : Membership during the previous year and shall include an
B179 : estimate of the current year's operating costs and revenues.
B180 : The report shall be made available, upon request, to any
B181 : member of the NFCC.
B182 :
B183 : Section 3. Removal.
B184 :
B185 : Directors may be removed by affirmative vote of 2/3 (66.7%)
B186 : of the NFCC membership. Such determination may be by mail-in
B187 : ballot, electronic ballot or in-person vote.
B188 :
B189 : Section 4. Replacement.
B190 :
B191 : If a Board member is removed for cause, resigns, ceases to
B192 : be a member of the NFCC, or is deceased or otherwise
B193 : incapacitated and cannot serve, such departing Board member
B194 : shall be replaced by an "interim" Board member from the
B195 : general NFCC membership, nominated by the President and upon
B196 : concurrence of the remaining Board members. The interim
B197 : Board member serves the remainder of the replaced Board
B198 : member's term, or until the next NFCC Directors' election,
B199 : whichever occurs first.
B200 :
B201 : Section 5. Meetings.
B202 :
B203 : The Board of Directors shall meet at least semi-annually,
B204 : either in person or by telephonic or electronic means.
B205 : Notice of telephonic or electronic meetings shall be given
B206 : by the President not less than two weeks in advance unless
B207 : such notice is waived by all Directors. Notification of all
B208 : in-person meetings shall be given a minimum of sixty (60)
B209 : days in advance unless waived by all directors. Minutes of
B210 : all Board meetings shall be prepared by staff of the NFCO.
B211 :
B212 : Section 6. Voting.

B213 :
B214 : (a) Cumulative voting shall not be allowed.
B215 :
B216 : (b) Each director shall have one vote in all NFCB business.
B217 :
B218 : (c) Proxy votes shall not be allowed.
B219 :
B220 : Section 7. Quorum.
B221 :
B222 : Three of the five directors shall constitute a quorum for
B223 : the transaction of business. If there are fewer than five
B224 : directors, then a majority of the Directors in office shall
B225 : constitute a quorum.
B226 :
B227 : Section 8. Duties.
B228 :
B229 : The Board shall represent all Amateur Radio frequency
B230 : coordination entities (which constitute the general
B231 : membership) as the official SPOC with the FCC. This function
B232 : may be delegated, and the Board may request that other
B233 : entities, such as the ARRL, conduct contacts with government
B234 : agencies on behalf of the NFCC subject to the review and
B235 : approval of the NFCC.
B236 :
B237 : Article V. National Frequency Coordinators' Office
B238 :
B239 : The NFCB shall establish and oversee administration of the
B240 : National Frequency Coordinators' Office (NFCO). The NFCO
B241 : shall operate under the direct supervision of the Chairman
B242 : of the Board and shall conduct all daily operations
B243 : necessary to the stated purposes of the NFCC and in
B244 : accordance with any Memorandum of Understanding and other
B245 : policy statements adopted by the Board of Directors or the
B246 : NFCC. The NFCO shall take no action inconsistent with FCC's
B247 : status as a tax-exempt organization under the federal
B248 : Internal Revenue Code, as it may be amended from time to
B249 : time.
B250 :
B251 : Article VI. Governing Officers
B252 :
B253 : Section 1.
B254 :
B255 : The members of the Board of Directors shall annually elect
B256 : officers, consisting of a President, a Vice President, a

B257 : Secretary, and a Treasurer. The President and Vice President
B258 : must be elected from those then serving on the Board of
B259 : Directors. The President or Vice President may also serve as
B260 : Chairman of the Board, but the Chairman of the Board may not
B261 : also serve as Treasurer or Secretary. The officers shall
B262 : perform the duties and tasks assigned to them by the Board
B263 : of Directors, and shall serve otherwise to execute and
B264 : implement the policies of the Board of Directors. The
B265 : President shall preside at all meetings of the Membership.
B266 :
B267 : Section 2.
B268 :
B269 : The Vice President shall assume the duties of the President
B270 : in his or her absence or incapacity and shall otherwise
B271 : assist the President.
B272 :
B273 : Section 3.
B274 :
B275 : No officer shall receive any compensation for services
B276 : performed for the NFCC, but officers may, in the discretion
B277 : of the Board of Directors, be reimbursed for reasonable
B278 : expenses incurred in the performance of official duties upon
B279 : presentation and verification of such expenses.
B280 :
B281 : Article VII. Dues
B282 :
B283 : Section 1.
B284 :
B285 : Reasonable annual dues may be established upon resolution of
B286 : the Board of Directors and approval by a majority of the
B287 : NFCC.
B288 :
B289 : Section 2.
B290 :
B291 : A member must pay dues by the published deadline to be
B292 : eligible to vote on any matters. A member whose dues
B293 : payments are in arrears will be considered a non-voting
B294 : member and shall not be allowed to vote on any NFCC
B295 : business. Any non-voting members may be restored to voting
B296 : status immediately upon payment of the annual dues adopted
B297 : by the NFCC. All members, voting and non-voting, may present
B298 : items for consideration by the NFCC membership and/or Board
B299 : of Directors.
B300 :

B301 :
B302 : Article VIII. Meetings
B303 :
B304 : An in-person meeting of the Membership of the NFCC shall be
B305 : called by the President when:
B306 :
B307 : (a) Two thirds, (66.7%) of the Membership requests such a
B308 : meeting in writing, or electronically; or
B309 :
B310 : (b) The Board of Directors orders such a meeting.
B311 :
B312 : In both cases, a minimum of ninety (90) days' advance notice
B313 : of all Membership meetings must be mailed to all NFCC voting
B314 : members. Such a notice shall list the reasons for calling
B315 : the meeting and include an agenda.
B316 :
B317 : Article IX. Voting, Ballot Issues, Quorum at Membership
B318 : Meetings
B319 :
B320 : Section 1. Voting.
B321 :
B322 : (a) Cumulative voting shall not be allowed in conducting any
B323 : NFCC business at Membership Meetings.
B324 :
B325 : (b) Each NFCC Representative shall have a number of votes
B326 : based on the percentage of the total U.S. Amateur Radio
B327 : license holders within the geographic area coordinated by
B328 : the representative's organization. Each representative shall
B329 : have one vote for each five-tenths percentage (0.5%),
B330 : rounded to the nearest 0.5%. Each representative shall have
B331 : a minimum of one vote.
B332 :
B333 : (1) The NFCC Secretary shall use annual FCC data to
B334 : calculate and tabulate vote totals each year for each
B335 : representative. The resulting annual tabulation shall be
B336 : posted on the retailer and enclosed with all NFCC meeting
B337 : notices.
B338 :
B339 : (2) In those areas served by more than one recognized
B340 : coordination entity, those entities shall jointly agree how
B341 : to divide their votes. They shall then send a jointly signed
B342 : letter of agreement to the NFCC Secretary so as to arrive a
B343 : minimum of one week ahead of the meeting.
B344 :

B345 : (3) The NFCC Secretary shall provide an up to date vote
B346 : tabulation, including any vote splits required by (2) above,
B347 : to all Directors prior to the meeting.
B348 :
B349 : (c) Co-Jurisdictional Voting Apportionment.
B350 :
B351 : Digital and other recognized geographically co-located
B352 : coordinators will have an apportioned vote. This
B353 : apportionment shall be from the allotted votes for its
B354 : geographical jurisdiction/s, and shall be mutually agreed
B355 : upon by the other recognized co-jurisdictional coordinator/s.
B356 :
B357 : Section 2. Proxies.
B358 :
B359 : (a) Written proxy votes may be used at all NFCC meetings to
B360 : satisfy quorum requirements and to vote on specific or all
B361 : matters under consideration.
B362 :
B363 : (b) For a written proxy to be valid, the following
B364 : conditions shall be met:
B365 :
B366 : (1) All written proxies shall be on a pre-printed form
B367 : supplied by the NFCC Secretary. This form shall state that
B368 : the proxy is only valid for a specific NFCC meeting and is
B369 : automatically void if the grantor of the proxy attends in
B370 : person.
B371 :
B372 : (2) All written proxies shall be signed and dated by the
B373 : person granting the proxy. Such proxies may be given to
B374 : another NFCC representative or any member of the grantor's
B375 : coordination entity. If the person receiving the proxy is
B376 : not a previously certified NFCC representative, a letter of
B377 : authentication on the coordination entity's letterhead shall
B378 : accompany the proxy.
B379 :
B380 : (3) The NFCC proxy form shall list all known agenda items.
B381 : The proxy grantor may "restrict" the proxy by designating on
B382 : the form how each agenda item is to be voted. The grantor
B383 : may also give an "unlimited" proxy which allows the proxy
B384 : holder to vote on any or all items as he desires. Proxies
B385 : may also be a combination of "unlimited" and "restricted"
B386 : where the unlimited option is selected and one or more
B387 : agenda items are voted.
B388 :

B389 : (4) All proxies shall be filled out in ink or typed and sent
B390 : to the NFCC Secretary so as to arrive a minimum of one week
B391 : prior to the meeting. The Secretary shall register all
B392 : written proxies and supply a tabulation of same to all NFCC
B393 : Directors prior to the start of the meeting.
B394 :
B395 : (5) Any written proxies failing to meet any of the above
B396 : requirements shall be recorded by the Secretary as being
B397 : received but invalid. Time permitting, every reasonable
B398 : effort shall be made to obtain a correctly executed written
B399 : proxy from those individuals granting invalid proxies.
B400 :
B401 : (6) As a result of discussions which were not included on
B402 : the original agenda, or as may come up that, prior to a
B403 : vote, that a recess be initiated to allow proxy holders to
B404 : confer with the proxy grantors.
B405 :
B406 : Section 3. Ballot Issues.
B407 :
B408 : (a) All proposals concerning Amateur Radio band plans;
B409 : frequency coordinator standards, certification, succession
B410 : and recognition; frequency coordination and decoordination
B411 : procedures; and frequency coordinator succession shall be
B412 : approved by a minimum of seventy-five percent (75%) of the
B413 : NFCC, whether at an in-person meeting or by mail or
B414 : electronic ballot. All vote tallies shall be published,
B415 : listing how each member voted, for review by all NFCC voting
B416 : members.
B417 :
B418 : Section 4. Quorum.
B419 :
B420 : Fifty percent (50%) of all voting members, either present or
B421 : the sum of those present and valid written proxies, shall
B422 : constitute a quorum for the transaction of business at an
B423 : in-person meeting. Fifty percent (50%) return on mail and/or
B424 : electronic ballots sent to the entire Membership constitutes
B425 : a quorum for the tallying of mail or electronic ballots. No
B426 : issue shall be decided, regardless of the voting method,
B427 : unless a quorum of votes are cast. Should a vote fail to
B428 : draw the required fifty percent to satisfy the quorum, no
B429 : further business shall be conducted until a quorum is
B430 : present.
B431 :
B432 : Article X. Dissolution

B433 :
B434 : In the event of the cessation of any activities of the Board
B435 : of Directors for a period of at least fifteen (15) calendar
B436 : months, the then remaining NFCC voting members may either
B437 : replace the entire Board by Membership vote, or otherwise it
B438 : may resolve to dissolve the Board of Directors and turn over
B439 : management and control of the NFCC to the ARRL. Upon
B440 : approval by seventy-five percent (75%) of such NFCC members,
B441 : whether at an in-person meeting or by mail-in ballot, the
B442 : Officers shall (1) pay all outstanding bills, if assets
B443 : permit, (2) surrender the corporate charter, and (3)
B444 : transfer any and all remaining assets to the American Radio
B445 : Relay League Foundation.
B446 :
B447 : Article XI. Amendments
B448 :
B449 : (a) Any voting member may submit to the Board of Directors a
B450 : proposal for amendment of these Bylaws. Ninety (90) days
B451 : written advance notice of any such proposal shall be given
B452 : to all NFCC voting members by the President. Upon compliance
B453 : with the Articles on Meetings and/or Ballot Issues set forth
B454 : in these Bylaws, an in-person meeting or written ballot to
B455 : consider such proposal shall be called.
B456 :
B457 : (b) These Bylaws may be amended by affirmative vote of a
B458 : minimum of seventy-five percent (75%) of the NFCC, whether
B459 : at an in-person meeting or by mail-in ballot.
B460 :
B461 : End

APPENDIX C

The National Frequency Coordinators Council frequency coordination certification standards:

- ST001: NFCC FREQUENCY COORDINATION
ST002: CERTIFICATION STANDARDS
ST003:
ST004:
ST005: I. PURPOSE:
ST006:
ST007: These standards are the minimum standards for frequency
ST008: coordinators which are accepted by the nation's amateur
ST009: radio frequency coordination community. The purpose of
ST010: these standards is to ensure that all amateur radio
ST011: service (ARS) frequency coordinators meet minimum
ST012: standards in the performance of their volunteer services.
ST013:
ST014: These certification standards are approved by members
ST015: of the NFCC.
ST016:
ST017: To be certified by the NFCC, frequency coordination
ST018: entities shall adhere to the requirements and standards
ST019: listed below. The coordination organization President
ST020: or Chairman or, in the case of recognized "stand alone"
ST021: coordinators, the Frequency Coordinator shall provide
ST022: to the NFCC a completed Coordinator's Certification
ST023: Application. This signed application states the
ST024: organization or individual subscribes to and shall
ST025: follow these standards while conducting ARS frequency
ST026: coordination activities.
ST027:
ST028: NFCC certification is a requirement for NFCC membership.
ST029: A frequency coordination entity does not have to become
ST030: an NFCC member to either request or be granted certification
ST031: by the NFCC. Nothing in these standards is meant to imply
ST032: or circumvent the authority and legitimacy of a recognized
ST033: frequency coordination entity. No frequency coordinator
ST034: is required to be either a member of the NFCC or
ST035: certified by the NFCC; however, certification and

ST036: membership are encouraged.
ST037:
ST038: II. DEFINITIONS:
ST039:
ST040: A. FREQUENCY COORDINATION ENTITY: an organization or
ST041: person(s), recognized by a majority of the holders
ST042: of coordination within a defined geographic service
ST043: area, that provides frequency coordination services
ST044: in that geographic service area and within specified
ST045: frequency bands.
ST046:
ST047: B. NEIGHBORING COORDINATION ENTITY: a frequency
ST048: coordination entity that has a geographic service
ST049: area adjacent to another entity's service area.
ST050:
ST051: C. CROSS-BORDER COORDINATION: a frequency coordination
ST052: in one frequency coordination entity's geographic
ST053: service area that includes part of another entity's
ST054: geographic service area in its coverage.
ST055:
ST056: D. HOLDER OF COORDINATION: the organization or
ST057: individual to whom a frequency coordination is
ST058: issued.
ST059:
ST060: E. TRUSTEE: the individual holding the ARS call that
ST061: is used as a system ID.
ST062:
ST063: F. SYSTEM: inclusive of, but not limited to, repeaters,
ST064: auxiliary stations, control links, and/or other
ST065: non-mode-specific integrated network station(s).
ST066:
ST067: G: APPENDED DOCUMENTS: appendices become a part of this
ST068: document when they are approved per NFCC By-Laws,
ST069: Article IX, Section 3a. Each appendix is to cover a
ST070: single specific subject.
ST071:
ST072: H: CONCURRENCE: an agreement between two or more
ST073: coordination entities that a proposed coordination
ST074: is approved.
ST075:
ST075: III. CERTIFICATION STANDARDS:
ST076:
ST077: Performance above these minimums is encouraged. While
ST078: no time limit for enhancing or compliance to these

ST079: standards will be imposed, it will be expected that the
ST080: participating entity will use their best efforts to
ST081: voluntarily ensure compliance at every available
ST082: opportunity.
ST083:
ST084: Coordination data is the proprietary property of each
ST085: frequency coordination entity and shall not be released
ST086: to any agency or person without prior approval from the
ST087: originating entity.
ST089: All NFCC-certified frequency coordination entities
ST090: shall adhere to the following standards:
ST091:
ST092: A. Maintain an up-to-date list, with necessary contact
ST093: data, of executive officers and other key personnel
ST094: with the NFCC.
ST095:
ST096: B. The contact data provided must include:
ST097:
ST098: 1.) Name
ST099: 2.) Callsign
ST100: 3.) Address
ST101: 4.) Telephone number
ST102: 5.) E-mail address (if applicable)
ST103:
ST104: C. Maintain a frequency coordination database
ST105: consisting of at least the following items:
ST106:
ST107: 1.) System callsign
ST108: 2.) System input and output frequencies
ST109: 3.) System location
ST110: 4.) System sponsor
ST111: 5.) System user access methods
ST112: 6.) System emission(s)
ST113: 7.) System coordinates
ST114: 8.) Remote receiver coordinates
ST115: 9.) Applicable System link and/or control frequency(s)
ST116: 10.) If known, the date of original coordination
ST117: 11.) Trustee's name, call, address, telephone
ST118: number, and e-mail address (if applicable).
ST119: 12.) Antenna height in AMSL, and/or HAAT
ST120: 13.) Antenna pattern(s) and azimuth(s)
ST121:
ST122: i.) The data listed in section III , part C
ST123: (1) thru (5) shall be provided to the NFCC

ST124: data repository by each recognized
ST125: frequency coordination entity.
ST126:
ST127: ii.) The data listed in section III, part C (6)
ST128: is recommended to be provided to the NFCC
ST129: data repository by each recognized
ST130: frequency coordination entity.
ST131:
ST132: iii.) No data shall be released by the NFCC to
ST133: an agency or individual without prior
ST134: permission of the originating frequency
ST135: coordination entity.
ST136:
ST137: iv.) Nothing in these standards shall be
ST138: construed as restricting the right of a
ST139: coordination entity from releasing
ST140: coordination data for its own purposes,
ST141: including its own fund-raising effort(s).
ST142:
ST143: v.) The data listed in section III, part C
ST144: (12) thru (13) is recommended only.
ST145:
ST146: D. Coordination entities may use any database
ST147: management system.
ST148:
ST149: E. Each coordinator shall publish their coordination
ST150: policies and guidelines and keep a copy on file with
ST151: the NFCO.
ST152:
ST153: F. Agree to recognize, cooperate with, and respond,
ST154: within thirty days, to legitimate inquiries from,
ST155: adjacent recognized frequency coordination entities.
ST156: Additionally, all frequency coordination entities
ST157: must agree to provide, within thirty days,
ST158: notification of proposed new or modified frequency
ST159: coordinations to any adjacent-area coordinator(s)
ST160: whose area(s) may be affected by the proposed
ST161: coordination.
ST162:
ST163: G. Each coordination entity shall have established
ST164: procedures for succession. Coordination entities
ST165: may request, but are not required to hold, an
ST166: NFCB-supervised election to determine who shall be
ST167: the recognized coordinator in that area in the event

ST168: succession is necessary for whatever reason. The
ST169: NFCB may require a non-refundable 75% advance cash
ST170: deposit to be applied against these projected expenses.
ST171:
ST172: H. Agree to use published dispute resolution procedures
ST173: for disputes involving more than one coordination
ST174: entity.
ST175:
ST176: I. Agree, as a condition of continued certification, to
ST177: adhere to properly approved amendments and appended
ST178: documents.
ST179:
ST180: IV. RATIFICATION:
ST181:
ST182: These certification standards were ratified by the NFCC
ST183: membership on March 15, 1998 and are binding
ST184: upon all current and future NFCC-certified coordinators.
ST185:
ST186: END