

FCC MAIL SECTION

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FCC 99-84

DISPATCHED BY

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	WT Docket No. 95-57
)	
Amendments to the Amateur Service Rules)	
Including Amendments for Examination Credit,)	RM-8301
Eligibility for a Club Station License, Recognition)	RM-8418
of the Volunteer Examiner Session Manager,)	RM-8462
a Special Event Call Sign System and a)	
Self-Assigned Indicator in the Station)	
Identification.)	

MEMORANDUM OPINION AND ORDER**Adopted: April 26, 1999****Released: April 30, 1999**

By the Commission:

I. INTRODUCTION

1. In this *Memorandum Opinion and Order (Order)*, we address a Petition for Reconsideration (Petition) filed by David B. Popkin (Petitioner).¹ The Petition requests that certain changes be made in the special event call sign system that the Commission established by the *Report and Order* adopted in this proceeding.² The Petitioner's requested changes would require an amateur station to identify its transmissions with its assigned call sign at the end of a continuous series of transmissions. The changes would also limit the use of a special event call sign to fifteen days, with a thirty-day interval between successive assignments of the same call sign. The Petitioner also requests that the assignment of special event call signs be made on a first-come, first-served, non-discriminatory basis, and that it be done on a no-charge or non-profit basis. For the reasons set forth below, we believe that the public interest will best be served by denying the Petition.

II. BACKGROUND

2. In 1995, the Commission established a mechanism whereby a small block of call signs (750 one-by-one call signs)³ were reserved for temporary use by amateur stations during events that are of

¹ David B. Popkin, Petition for Reconsideration, filed May 1, 1997.

² See In the Matter of Amendments to the Amateur Service Rules Including Amendments for Examination Credit, Eligibility for a Club Station License, Recognition of the Volunteer Examiner Session Manager, a Special Event Call Sign System, and a Self-Assigned Indicator in the Station Identification, WT Docket No. 95-57, *Report and Order*, 12 FCC Rcd 3804 (1997).

³ A one-by-one call sign consists of a single prefix letter (K, N or W), the region number (0 to 9), and a single suffix letter (A to W, Y and Z).

special significance to the amateur community.⁴ A special event call sign helps amateur operators to call attention "on-the-air" to their participation in the event as well as helping to foster public awareness of the event. The Commission had received requests for one-by-one call signs to be used by amateur stations in conjunction with a wide variety of events, such as conventions, festivals, dedications, and anniversaries. The amateur community wanted some type of special call sign system for those purposes.⁵ The Commission responded by authorizing the licensee of an amateur station, operating in conjunction with an event that the licensee determines to be special, to substitute for its assigned call sign a self-assigned call sign from the block of one-by-one call signs.⁶ In the *Report and Order* in this proceeding, the Commission emphasized that the operation of a special event station does not require additional skill, nor does it authorize any additional operating privileges. It simply allows an already-licensed station to use temporarily a different call sign in the identification announcement in order to attract greater attention to the presence of the station.⁷ To implement the special event call sign system, the Commission delegated authority to the Chief, Wireless Telecommunications Bureau to certify volunteer entities to serve as amateur station special event call sign database coordinators, whose responsibility is to coordinate, maintain and disseminate a common on-line database for the block of special event call signs.⁸

III. DISCUSSION

3. *Station Identification.* Section 97.119(d) of the Commission's Rules, 47 C.F.R. § 97.119(d), requires that the station's assigned call sign be transmitted at least once per hour when the station is using a special event call sign. The Petitioner requests that this rule be changed to require the identification at the end of a continuous series of transmissions as well as at least once per hour.⁹ The Petitioner argues that this would allow a station to obtain the information in the event that operation terminated after a less than the one-hour period following station identification.¹⁰ The purpose of station identification is to apprise other amateur operators of the identity of the station making the transmission. As long as this is reasonably done, there is no need for a plethora of identification transmissions. Thus, we believe that modification of the rule to specify that the assigned call sign be transmitted at the end of a series of transmissions is unnecessary because the rules already require that the call sign be transmitted at the end of each communication, as well as hourly.¹¹

⁴ See In the Matter of Amendment of the Amateur Service Rules to Implement a Vanity Call Sign System, PR Docket No. 93-305, *Report and Order*, 10 FCC Rcd 1039 (1995).

⁵ See note 2, *supra*, ¶ 12.

⁶ See note 2, *supra*, ¶ 14. See also 47 C.F.R. § 97.119(d).

⁷ See note 2, *supra*, ¶ 16.

⁸ See note 2, *supra*, ¶ 15.

⁹ Petition at 1.

¹⁰ *Id.*

¹¹ 47 C.F.R. § 97.119(a) and (d).

4. *Length of Use.* The Petitioner believes that the rules should specify a maximum of 15 days duration for a special event call sign.¹² The Petitioner argues that this time limit is necessary to ensure that the special event call signs will be available to all amateur operators.¹³ We believe that specification of a maximum of 15 days for a special event call sign is unnecessary because most events that qualify as "special" last only a few days. For example, we have received requests for special event call signs for conventions, festivals, and anniversaries; events that by their very nature are limited in duration. Further, we have not received any complaints from amateur operators that they have been unable to receive a particular special event call sign because it was being used for an extended period of time by another amateur operator.

5. The Petitioner also requests that there be a rule provision specifying a 30-day period before a special event call sign is available for use by another amateur station.¹⁴ He argues that a 30-day interval is necessary to ensure availability of the special event call signs to other amateur operators.¹⁵ We believe that there is no need for a rule provision that would establish a 30-day interval before a special event call sign is available for use by another amateur station because such an interval potentially could result in an unnecessary delay in the reuse of the call sign. The Commission's current procedure is that once a station finishes using a special event call sign, it is available immediately to another station. Moreover, the special event call sign database maintained by the Special Event Call Sign Database Coordinators (Coordinators) is widely available on the Internet. It shows current, past and future use of the various special event call signs. Thus, we believe that our current rules and procedures sufficiently address concerns regarding appropriate length of use of special event call signs.

6. *Availability of Special Event Call Signs.* The Petitioner requests that the rules be amended to specify that the special event call signs are available on a first-come, first-served, non-discriminatory, and non-profit basis.¹⁶ The Petitioner argues that this is necessary because the Coordinators are private organizations.¹⁷ The Coordinators are certified by the Chief, Wireless Telecommunications Bureau to act in that capacity. They have the responsibility for coordinating, maintaining, disseminating, and keeping current the list of special event call signs in a common database. An amateur operator who wants a special event call sign simply contacts the Coordinator who then reserves it for the requestor if it is available. The call signs are already set up on a first-come, first served, non-discriminatory basis and, thus, a rule provision to that effect is not necessary.

7. *No Compensation for Services.* The Petitioner requests that the rules be amended to specify that the Coordinators shall not receive compensation for the services they perform.¹⁸ The Petitioner argues

¹² Petition at 2.

¹³ *Id.*

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ *Id.*

¹⁷ *Id.*

¹⁸ *Id.*

that this is necessary because the Coordinators are private organizations.¹⁹ There are five entities that have been approved by the Commission to serve as Coordinators.²⁰ The services that they provide to the amateur community in connection with coordinating the special event call sign system are already being offered on a voluntary basis, without compensation.²¹ As a result, we find that a provision in the rules to that effect is not needed.

IV. CONCLUSION

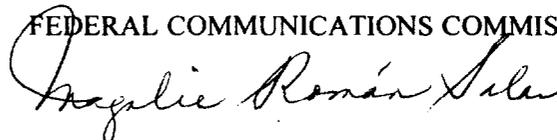
8. For the foregoing reasons, we decline to adopt the further rule changes suggested by the Petitioner because our current rules governing the special event call sign system already adequately address his concerns. Thus, we conclude that the Petitioner's suggested changes are unnecessary.

V. ORDERING CLAUSE

9. Accordingly, IT IS ORDERED, pursuant to the authority contained in Sections 4(i), 303(r) and 405(a) of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 303(r) and 405(a), and Sections 1.106 and 1.429 of the Commission's Rules, 47 C.F.R. §§ 1.106 and 1.429, that the Petition for Reconsideration, filed by David B. Popkin, IS HEREBY DENIED.

10. IT IS FURTHER ORDERED that this proceeding IS TERMINATED.

FEDERAL COMMUNICATIONS COMMISSION



Magalie Roman Salas
Secretary

¹⁹ *Id.*

²⁰ The American Radio Relay League, Inc., Laurel Amateur Radio Club, W4VEC-VEC, W5YI Group, and WCARS/VEC.

²¹ See note 2, *supra*, ¶ 15.