

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

In the Matter of)
)
Petition of Mr. Dale Reich) Proceeding: RM-10620
Proposing Certain Changes in)
Amateur Radio Service Regulations)

To: The Commission

SUPPLEMENTAL COMMENTS

The comments set forth herein are respectfully submitted by Bradley Farrell of Alexandria, Virginia (the “Commentor”)¹ to supplement the Commentor’s previous comments filed in this proceeding on January 10, 2003.

Petitioner Dale E. Reich (the “Petitioner”) has filed, to date², no fewer than six supplemental comments to his original petition in this proceeding (RM-10620)(the “Petition”). Notwithstanding the numerous filings, neither the Petition nor any of the supplemental comments point to any development or evidence, factual or otherwise, that support the proposals set forth by the Petitioner.³ Therefore the Commission should reject the Petition outright.

Remarkably, the Petitioner now attempts to expand the scope of his Petition by proposing, among other things, that the Commission accept for Amateur Radio examination credit (1) internal accreditation issued by “Military’ [sic]” training schools and (2) work-related experience of applicants who received

¹ Holder of an Amateur Radio license for 24 years and an accredited volunteer examiner under the Commission’s volunteer examiner program.

² At the time of the instant filing.

³ Instead of supporting the baseless assertions in his original Petition with evidence or sound reasoning, the Petitioner attempts post-Petition to amend his proposals on the fly by submitting for the consideration of the Commission and the public even more baseless assertions.

duty assignments in the field of electronics during military service. See Dale E. Reich [Additional Comments About Part 13 Credit Related Sub'd](#), at 1 (Jan. 16, 2003). The Petition fails to point to any development or evidence, factual or otherwise, that support the Petitioner's new proposals. Therefore the Commission should reject the new proposals outright.

With regard to the Petitioner's proposed automatic upgrade for Advanced Class licensees, sound reasons for rejecting this proposal have been articulated by the Commentor and many others who have filed comments in this proceeding.

For example, Jose Berrios of Forest Hills, New York stated in his comments on December 30, 2002:

If [amateur] radio is to provide our nation with needed communications expertise in time of war or major disasters, a trained knowledgeable pool of [communicators] is desirable not just license holders who have "put in their time" but [have] not demonstrated the aptitude for the more complex concepts or skills required for a higher class license. By taking away the requirements for a higher class license, we are lowering our standards and reducing the incentive to acquire more knowledge and skills.

Murray Green of Cheverly, Maryland, on December 30, 2002, appropriately highlighted the Petitioner's baseless public service argument:

I fail to see where public service can be augmented by automatically giving an upgrade from Advanced to Extra class license based on years of operation. The additional Extra class frequencies, to the best of my knowledge, are not normally used for amateur radio public service. It also degrades the incentive licensing program by [virtue] of no testing, where others have earned the [privilege] through the Incentive Licensing testing program.

Furthermore, comments filed by other parties in support the Petition appear to be largely based on unsubstantiated opinion.

Edwin Kessler of Millersburg, Pennsylvania (January 6, 2003):

First, the length of a person's license tenure does not equate to increased technical knowledge or skill and that is what effective emergency communication requires. Second, persons who have held a license for many years have had a myriad of opportunities to upgrade via the standard procedures. There is no good reason to circumvent those procedures for those who are able, but apparently not willing, to upgrade. Finally, it does not stand to reason that emergency communications will be enhanced by simply increasing the license class of long-term Novice or Advanced license holders.

Larry W. Wheeler of Spencerville, Indiana pointed on January 16, 2003 to the administrative burdens the proposal might create:

Besides sending the wrong message to those who have worked for their privileges within the FCC's incentive based licensing structure, adoption of RM-10620 would place a heavy burden on the volunteer [examiner]. In many cases the [examiner] will be asked to accept an application for upgrading from individuals that have not been active for many years. RM-10620 will compromise the licensing process by allowing unverifiable information to be used as an element of licensing.

Finally, Tim Isom of Northfield Minnesota, in his comments filed January 7, 2003, echoed the Commission's long settled view that "those of us using our amateur experience in public service are in need of people who are trained and active, not someone who advanced because they have enough time to qualify." Other sound, reasoned comments have been filed in this proceeding in opposition to the Petition.

As the Commission has repeatedly acknowledged for some eighty years, the Amateur Radio service is an integral element of the nation's emergency communications backbone. The Commission's incentive licensing program, which requires that licensees demonstrate basic knowledge and skills in order to

obtain a higher class license, protects the integrity of this national communications resource and ensures that licensees, through the successful passage of Commission examinations, possess the basic knowledge and skills needed to exercise the corresponding spectrum and mode privileges for the respective license classes.

For the reasons set forth herein, the Commission should reject the Petition in its entirety.

Respectfully submitted,

/s/ Bradley Farrell

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January 17, 2003