

**Before the
Federal Communications Commission
Washington, DC**

In the matter of:)
)
Amendment of Part 97 of the) **RM-11306**
Commission's Rules Governing)
the Amateur Radio Service)

Reply Comments to Petitioner

Introduction

This filing is from Paul Courson, licensed Amateur WA3VJB. I have previously submitted to the FCC an *ex parte* document timely filed in response to Docket 04-140, foreshadowing the Petitioner's patronizing, misleading treatment of licensed Amateurs who comply with the law and in the majority are clearly against the Matter before you.

Opposition

Petitioner, in this group's Reply Comment, has utterly failed to recognize the significance of having Opposition Comments outnumbering by a margin of greater than six to one the number of supporters for their flawed plan.

No amount of praise uttered by this group's counsel regarding the quantity of turnout can obscure the fact the response is, on whole, against the scheme the Petitioner has proposed.

It is disingenuous to trivialize the concerns expressed to the Commission as a simple "reluctance to change the status quo." This group's attitude dismissing such concerns has been a hallmark of their prolonged deliberations as this threatened Petition took form.

The group in Newington saw early signs their proposal would not achieve adequate support in the Amateur community, as now proven by the Comments formally filed with the FCC.

The group ignored widespread calls to disclose a simple tally of *for* and *against* among the responses solicited to a blind email box the past two years, and the Comment turnout now suggests clients would not have allowed Petitioner to submit this plan had it revealed the depth of early opposition.

Opposition (con't.)

Indeed they have refused to publicly engage with their clients, here meaning both the paid subscribers to their group as well as their putative constituents who decline to pay such fees.

Analysis

Any group claiming to be a "national association" must consider making concessions when its leadership has taken a path not generally supported by constituents.

Yet, instead of now accepting the Comments filed in good faith delineating valid concerns against their scheme, the Newington group has indicated its refusal to withdraw its Petition or offer any sort of compromise.

This leaves it up to the Commission to use its wisdom to review the body of Comments filed in this proceeding, and to consider accepting any elements that appear to hold the best prospect of compromise among the goals, concerns and cross-purpose directions that must be accommodated.

Conclusion

The American Radio Relay League has lost its mandate to represent the Amateur Service, evidenced by a prolonged slide in paid subscriptions ("membership") that now hovers at 25 percent of licensed U.S. amateurs, according to federal records.

Their intransigence in trying to avoid valid criticism of this Petition before you is likely to continue to undercut their place in this hobby.

The FCC will therefore obtain better input on Amateur matters from individuals and groups more progressive than the ARRL.

Such input is available to you among Comments filed.

-s-

Paul Courson
WA3VJB