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It has come to my attention that neither the present regulations or those which I proposed in my original request for proposed rulemaking directly address repeater operation. Therefore I am submitting the following to address this situation.

Present regulations do not make any differential as to identification requirements in relation to the actual use of the amateur radio station. Since repeater stations are, by their very nature, a "different animal", providing a separate regulation where repeater operation is concerned definitely makes sense. Therefore, it is suggested that provisions for identification of repeater stations be made by the adoption of language such as the following:

97.119(g) When the station is operating as a repeater the identification of the transmitter may be limited to once every 30 minutes during the period in which the repeater is in operation. Such identification will be made during the first transmission and within 30 minutes thereafter if the repeater transmitter has been activated at any time within the 30-minute period. If no transmissions are made by the repeater transmitter within 30 minutes then there shall be no need to activate the transmitter for identification. Identification may be made by any of the following methods:

- (1) By a CW emission. When keyed by an automatic device used only for identification, the speed must not exceed 20 words per minute.
- (2) By modulating the repeater transmitter with a keyed tone utilizing the International Morse code. When keyed by an automatic device used only for identification, the speed must not exceed 20 words per minute.
- (3) By a phone emission in the English language. Use of a phonetic alphabet as an aid for correct station identification is encouraged.
- (4) Where normal repeater operation utilizes emissions other than "phone" identification using that emission may be employed.

(5) By "other" means if such identification procedures have been approved directly by the Federal Communications Commission.

By adopting these, or similar, regulations the identification of repeaters will thus be "standardized. Therefore, I am submitting the above for consideration by the Commission.

Respectfully submitted.

A handwritten signature in black ink, appearing to read "Glen E. Zook", written over a light gray rectangular background.

Glen E. Zook, K9STH