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Federal Communications Commission
Office of the Secretary

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	WT Docket No. 08-20
	)	
WILLIAM F. CROWELL	)	FCC File No. 0002928684
	)	
Application to Renew License for Amateur Radio Service Station W6WBJ	)	File No. EB-08-IH-0434
	)	

DOCKET FILE COPY ORIGINAL

To: William F. Crowell

ENFORCEMENT BUREAU'S RESPONSE AND OBJECTIONS TO FIRST SET OF INTERROGATORIES

1. On February 26, 2008, William F. Crowell ("Crowell") directed to the Enforcement Bureau ("Bureau") his First Interrogatories ("Interrogatories"). At the prehearing conference held in this proceeding on April 2, 2008, the Presiding Judge directed the Bureau to respond or otherwise object to Crowell's Interrogatories by April 9, 2008.

2. The Bureau notes that many of the Interrogatories inquire into the behavior of Riley Hollingsworth, a Bureau employee, and consist of seriatim *ad hominem* attacks on his character. The Bureau finds these Interrogatories to be offensive in the extreme, entirely outside the scope of permissible discovery, and interposed in bad faith. The Bureau strongly objects to Crowell's disparaging remarks, provocative suggestions, and wholly inappropriate attempt to shift the focus of this hearing from an examination of his own conduct.

3. The Bureau, pursuant to 47 C.F.R. § 1.323(b) and (c), hereby responds and interposes the following objections to Crowell's Interrogatories:

INTERROGATORY NO. 1: Identify all persons whom the Enforcement Bureau (hereinafter "the Bureau") intends to call as witnesses in support of its Hearing Designation Order (hereinafter "H.D.O."), including their names, amateur radio call signs

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(if any), occupations, employers, business and residence addresses and business and residence telephone numbers, as well as a complete explanation of the substance of their anticipated and/or proposed testimony, including the date(s), time(s) and frequency(ies) and substance of any events which will be testified to by said witnesses.

The Bureau objects to this Interrogatory on the ground that it requires the Bureau to prematurely present information about its direct case. Furthermore, the Bureau has not yet developed a comprehensive witness list and is, therefore, unable to identify those individuals it intends to call as witnesses at this time.

INTERROGATORY NO. 2: Identify all documents that the Bureau intends to submit into evidence in support of its Hearing Designation Order and provide copies of same to Applicant.

The Bureau objects to this Interrogatory on the ground that it requires the Bureau to prematurely present information about its direct case. Furthermore, as discovery in this proceeding has only just begun, the Bureau has not yet developed a comprehensive exhibit list and is, therefore, unable to identify those materials it intends to enter into evidence.

INTERROGATORY NO. 3: When did Riley Hollingsworth first become employed by the Commission?

The Bureau objects to this Interrogatory on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 4: State the job positions held by Riley Hollingsworth at all times since becoming employed by the Commission, including the period of time in which he remained in each position; a general description of the duties of each position; the name, title, address and business and residence telephone numbers of Mr. Hollingsworth's immediate supervisor in each such position; and the reason why he left each such position.

The Bureau objects to this Interrogatory on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 5: On what date was Riley Hollingsworth appointed "Special Counsel For Amateur Radio Enforcement"?

The Bureau objects to this Interrogatory on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence. The Bureau further objects to this Interrogatory on the ground that it assumes facts not established.

INTERROGATORY NO. 6: Why was Riley Hollingsworth appointed "Special Counsel For Amateur Radio Enforcement"?
a. Was Mr. Hollingsworth threatened with termination or layoff at the time if he didn't create a new position for himself within the Commission?
b. How does the Bureau explain Mr. Hollingsworth's apparent demotion in or about 1998 from the position of Deputy Chief of Licensing and Assistant Bureau Chief of the Wireless Telecommunications Bureau to "S.C.A.R.E."?

The Bureau objects to this Interrogatory, including the subparts, on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence. The Bureau further objects to this Interrogatory, including its subparts, on the ground that it assumes facts not established.

INTERROGATORY NO. 7: In adopting the acronym "S.C.A.R.E." for his position, was Mr. Hollingsworth trying to scare someone?
a. Whom was he trying to scare?
b. Why was he trying to scare them?

The Bureau objects to this Interrogatory, including the subparts, on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence. The Bureau further objects to this Interrogatory,

including its subparts, on the ground that it assumes facts not established. In addition, the Bureau objects to this Interrogatory insofar as it exceeds the bounds of permissible discovery as set forth in 47 C.F.R. § 1.311(b)(4). Because the Interrogatory is improper and objectionable, the Bureau is unable to respond to subparts a and b.

INTERROGATORY NO. 8: Did Riley Hollingsworth ever read Title 47 of the U.S. Code of Federal Regulations, Chapter I, Subchapter D, Part 97 (the Commission's rules governing the amateur radio service; hereinafter "Part 97") before assuming his position as "S.C.A.R.E."?

The Bureau objects to this Interrogatory on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence. The Bureau also objects to this Interrogatory insofar as it exceeds the bounds of permissible discovery as set forth in 47 C.F.R. § 1.311(b)(4).

INTERROGATORY NO. 9: If the answer to Interrogatory No. 8 is in the affirmative, then why did Mr. Hollingsworth issue an opinion in or about May, 2000 in which he stated that amateur radio operators cannot use phonetics to identify their stations?
a. Did Mr. Hollingsworth have any on-the-air experience within the amateur radio service before becoming "S.C.A.R.E."?
b. If Mr. Hollingsworth claims to have such on-the-air experience, then why didn't he know that amateur radio operators have *always* been encouraged by Part 97 to use phonetics?
c. If Mr. Hollingsworth had no substantial on-the-air experience, then why does the Bureau contend that he is qualified to determine the propriety of on-the-air activities of other amateurs, such as Applicant, who apparently have much greater on-the-air experience and knowledge than Mr. Hollingsworth has?
d. If Mr. Hollingsworth had no substantial on-the-air experience, then how could he determine whether or not the actions of Applicant, of which the Bureau complains, were for years also commonly engaged in by the great majority of amateur radio operators?
e. If Mr. Hollingsworth had no substantial on-the-air experience, then how could he determine whether or not the alleged transmissions of Applicant were instead recordings being played on the air by another person?

The Bureau objects to this Interrogatory, including the subparts, on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence. In addition, the Bureau objects to this

Interrogatory insofar as it exceeds the bounds of permissible discovery as set forth in 47 C.F.R. § 1.311(b)(4). Because the Interrogatory is improper and objectionable, the Bureau is unable to respond to its subparts.

INTERROGATORY NO. 10:. In or about May, 2000, why was Mr. Hollingsworth unaware that Part 97, §97.119(b)(2), specifically encourages the use of a standard phonetic alphabet as an aid for correct station identification?
a. Why did he claim that, in trying to explain having made such a grave and telling mistake concerning regulation of the amateur service, he "suffered temporary insanity from excessive RF exposure"?
b. Did he *really* suffer temporary insanity as the result of excessive RF exposure, or was that just an excuse to avoid discussing the *real* reason he made such a grievous mistake; i.e., that he had insufficient knowledge of Part 97's requirements to permit him to know better?
c. What *was* the *real* reason that Hollingsworth thought radio amateurs were not supposed to use phonetics in identifying? (No lame jokes this time!)
d. If he *did* suffer temporary insanity as the result of excessive RF exposure, how does he know that the condition is not permanent?
e. If he *did* suffer temporary insanity as the result of excessive RF exposure, during what period of time did he suffer from it?
f. If he *did* suffer temporary insanity as the result of excessive RF exposure, what caused the condition to enter remission?
f. [sic] If he *did* suffer temporary insanity as the result of excessive RF exposure, what was the medical diagnosis of the condition?
g. [sic] If he *did* suffer temporary insanity as the result of excessive RF exposure, state all physicians and hospitals by whom he was treated for said condition, the dates of such treatment, the nature thereof, and whether it was on an in-patient or an out-patient basis.

The Bureau objects to this Interrogatory, including its subparts, on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence. The Bureau further objects to this Interrogatory, including its subparts, on the grounds that it is argumentative and assumes facts not yet established. In addition, the Bureau objects to this Interrogatory insofar as it exceeds the bounds of permissible discovery as set forth in 47 C.F.R. § 1.311(b)(4). Because the Interrogatory is improper and objectionable, the Bureau is unable to respond to its subparts.

INTERROGATORY NO. 11: In or about late September through early October, 2002, did Mr. Hollingsworth issue an advisory notice to several amateur radio operators, telling them that the frequency of 146.52 Mhz. was not a simplex frequency?

The Bureau objects to this Interrogatory on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence. The Bureau also objects to this Interrogatory insofar as it exceeds the bounds of permissible discovery as set forth in 47 C.F.R. § 1.311(b)(4).

INTERROGATORY NO. 12. On or about October 23, 2002, did Mr. Hollingsworth rescind his advisory notice referred to in Interrogatory No. 11?

The Bureau objects to this Interrogatory on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence. The Bureau also objects to this Interrogatory insofar as it exceeds the bounds of permissible discovery as set forth in 47 C.F.R. § 1.311(b)(4).

INTERROGATORY NO. 13: Why was it necessary for Hollingsworth to rescind his advisory notice referred to in the preceding two (2) Interrogatories?
a. Was he still suffering from temporary insanity due to excessive RF exposure at the time?
b. Or was it, again, that he was insufficiently familiar with the provisions of Part 97 to know better?
c. Does Mr. Hollingsworth now realize that 146.52 Mhz. has been a simplex frequency ever since amateurs began using the 2-meter amateur band in the 1940s? If not, state all reasons why Hollingsworth refuses to so admit.

The Bureau objects to this Interrogatory on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence. The Bureau further objects to this Interrogatory, including its subparts, on the grounds that it is argumentative and assumes facts not yet established. In addition, the Bureau objects to this Interrogatory insofar as it exceeds the bounds of permissible discovery as

set forth in 47 C.F.R. § 1.311(b)(4). Because the Interrogatory is improper and objectionable, the Bureau is unable to respond to its subparts.

INTERROGATORY NO. 14: Did Riley Hollingsworth ever attempt to promulgate or publicize a so-called "code of conduct" for radio amateurs?
a. If so, provide the details of said "code of conduct" or provide a copy thereof.
b. How was said "code of conduct" promulgated or publicized?
c. Was not said "code of conduct" a purely subjective creation of Riley Hollingsworth?
d. Did the Commission commence any rulemaking proceedings in an effort to add Hollingsworth's subjective "code of conduct" to Part 97?
d. [sic] What, if any, statutory or regulatory authority existed for Mr. Hollingsworth to promulgate or publicize his subjective "code of conduct"?
e. [sic] Does Hollingsworth admit that he tried to suggest to amateur radio operators that his "code of conduct" had the force and effect of law? If Hollingsworth denies same, state all reasons for his denial, in detail.
e. [sic] Does Hollingsworth deny that, at hamfests and elsewhere, he tried to create the impression that he would take official enforcement action against any ham radio operator who refused to comply with his "code of conduct"?
f. [sic] In so suggesting that his "code of conduct" had the force and effect of law, was Hollingsworth trying to "S.C.A.R.E." amateur radio operators into complying with it, even though said "code of conduct" had absolutely no legal effect?

The Bureau objects to this Interrogatory, including its subparts, on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence. The Bureau further objects to this Interrogatory, including its subparts, on the ground that it assumes facts not established. In addition, the Bureau objects to this Interrogatory insofar as it exceeds the bounds of permissible discovery as set forth in 47 C.F.R. § 1.311(b)(4). Because the Interrogatory is improper and objectionable, the Bureau is unable to respond to its subparts. The Bureau further objects to the second subpart d on the ground that it calls for a legal conclusion. The Bureau also objects to the form of both subpart e's on the ground that they are more in the nature of requests for admissions and not proper interrogatories.

INTERROGATORY NO. 15: Does Mr. Hollingsworth intend to take personal responsibility for all of the mistakes he has made in enforcing Part 97 (such as the one resulting in Mr. Delich's death), other than by trying to make lame jokes about them?
a. If he intends to do nothing to take personal responsibility for his many mistakes, does this not show bad faith and bad character on Mr. Hollingsworth's part?

The Bureau objects to this Interrogatory, including its subpart, on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence. The Bureau further objects to this Interrogatory, including its subpart, on the grounds that it is argumentative and assumes facts not yet established. In addition, the Bureau objects to this Interrogatory insofar as it exceeds the bounds of permissible discovery as set forth in 47 C.F.R. § 1.311(b)(4). Because the Interrogatory is improper and objectionable, the Bureau is unable to respond to subpart a. The Bureau further objects to the form of subpart a on the grounds that it is more in the nature of a request for admission, is not a proper interrogatory and it calls for a legal conclusion.

INTERROGATORY NO. 16: Does the Bureau contend that, in making all of his mistakes concerning amateur service enforcement, Hollingsworth was acting within the scope of his authority and employment by the Bureau, or not?
a. How can it be argued that he was acting within the scope of his authority and employment when he was telling amateurs they were required to do the exact opposite of what Part 97 *really* requires?
b. Does the Bureau contend that its employees are acting within the scope of their authority and employment if, due to ignorance or malice, they concoct phony laws and try to make Commission licensees follow such false and non-existent laws?

The Bureau objects to this Interrogatory, including its subparts, on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence. The Bureau further objects to this Interrogatory, including its subparts, on the grounds that it is argumentative and assumes facts not established. The Bureau further objects to subpart a on the ground that it calls for a legal conclusion.

INTERROGATORY NO. 17: In view of all of the mistakes that Mr. Hollingsworth has made in enforcing Part 97, why does he claim he is better qualified to determine the propriety and legality of other amateurs' conduct than Applicant is to determine the propriety and legality of his own conduct?

The Bureau objects to this Interrogatory on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence. The Bureau further objects to this Interrogatory on the grounds that it is argumentative and assumes facts not established. The Bureau also objects to this Interrogatory insofar as it exceeds the bounds of permissible discovery as set forth in 47 C.F.R. § 1.311(b)(4).

INTERROGATORY NO. 18: Does the Bureau admit that Hollingsworth actively solicited complaints against Applicant and is now using them against Applicant's in this license renewal proceeding?
a. What gave Hollingsworth the legal right to solicit complaints against Applicant and to use them against Applicant's in this license renewal proceeding?
b. Why does Hollingsworth's active solicitation of complaints against Applicant not run afoul of the Commission's ruling in the renewal case for the Washington Post's television stations in Washington Post, Inc. v. F.C.C. and Nixon?
c. What makes Hollingsworth think that he can inject himself into the renewal process to the extent of urging amateur radio operators to file complaints against any other amateur operator whose license they don't want renewed, without fatally compromising the Commission's impartiality, and therefore its legal position, in said renewal?
d. Are the persons who filed complaints against Applicant parties in interest to this renewal proceeding?

The Bureau objects to the form of this Interrogatory on the ground that it is not a proper interrogatory. The Bureau further objects to subparts a-d of this Interrogatory on the ground that they call for legal conclusions. The Bureau further also to subpart c of this Interrogatory insofar as it exceeds the bounds of permissible discovery as set forth in 47 C.F.R. § 1.311(b)(4).

INTERROGATORY NO. 19: Does the Bureau admit that amateur radio operators were largely "self-policing" before Riley Hollingsworth became "S.C.A.R.E."?
a. Why was it necessary to end the policy of hams being "self-policing" in about 1998, when Hollingsworth became "S.C.A.R.E."?
b. Does the Bureau believe that, in or about 1998, the Commission was under any duty, pursuant to the Administrative Procedures Act (A.P.A.), 5 U.S.C. §§706, et sequitur, to examine the relevant data concerning so-called amateur radio rules violations and to

articulate a satisfactory explanation for changing from a "self-policing" enforcement regime to a "S.C.A.R.E" enforcement regime in the amateur service? See Motor Vehicles Manufacturers' Association of the U.S., Inc. v. State Farm Mutual Auto Insurance Co. 463 U.S. 29, at p. 43; 103 S.Ct. 2856; 77 L.Ed.2d 443 (1983) and Securities and Exchange Commission v. Chenery Corp., 332 U.S. 194, at p. 196; 67 S.Ct. 1575; 91 L.Ed.2d 1995 (1947).
c. If the Commission contends that it was not required to take such action in 1998 pursuant to the A.P.A., state all factual and legal bases for such a contention, in detail.
d. Does the Bureau claim that amateur radio operators were given any notice in or about 1998 that the Bureau was going to change from a "self-policing" enforcement regime to a "S.C.A.R.E" enforcement regime?
e. If the Bureau contends that, in or about 1998, amateur operators were placed on notice of the change in enforcement regimes, state in detail the means and methods by which amateur radio operators were so placed on notice.

The Bureau objects to this Interrogatory, including its subparts, on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence. The Bureau also objects to this Interrogatory, including the subparts, on the ground that it assumes facts not established. The Bureau further objects to subparts b-d on the ground that they call for legal conclusions.

INTERROGATORY NO. 20: Does the Bureau claim that the "jamming" or intentional interference problem in the amateur radio service has worsened, remained approximately the same, or improved since Riley Hollingsworth became "S.C.A.R.E." in or about 1998?
a. If the Bureau claims the jamming problem has worsened or remained the same during Hollingsworth's tenure as "S.C.A.R.E.", is this not evidence of Riley Hollingsworth's incompetence? If not, why not?
b. If the Bureau claims the jamming problem has improved, state all evidence in support thereof.
c. If the Bureau claims the jamming problem has improved, does it admit that a "war zone" involving almost constant jamming in the 20-meter amateur band has developed and grown under Mr. Hollingsworth's tenure as "S.C.A.R.E.", and that Hollingsworth has done nothing to prevent it?
d. If the Bureau claims the jamming problem has improved, does it admit that a "war zone" involving almost constant jamming has developed and grown in the 40-meter amateur band under Mr. Hollingsworth's tenure as "S.C.A.R.E.", and that Hollingsworth has done nothing to prevent it?
e. If the Bureau claims the jamming problem has improved, does it admit that a "war zone" involving almost constant jamming has developed and grown in the 75-meter amateur band under Mr. Hollingsworth's tenure as "S.C.A.R.E.", and that Hollingsworth has done nothing to prevent it?

f. If the Bureau claims the jamming problem has improved, does it admit that unlicensed "freebanders" have invaded the 10-meter amateur band and that Hollingsworth has done virtually nothing about it?
g. If the Bureau claims the jamming problem has improved during Hollingsworth's tenure as "S.C.A.R.E.", does it admit that, virtually every afternoon when Applicant and his friends try to have a roundtable QSO on 3.810 Mhz. in the 75-meter amateur band, they are prevented by jammers, stations playing recordings and bootleggers from communicating with each other, and that Hollingsworth has done absolutely nothing about it?
h. Is it not true that, at the Dayton, Ohio Hamvention in 2007, Riley Hollingsworth made a speech to the participants in which he said, essentially, that the Bureau was going to return to the "self-policing" policy it had formerly followed before Hollingsworth became "S.C.A.R.E."?
i. Doesn't the fact that Hollingsworth found it necessary to return to the "self-policing" policy mean that his entire attempt to create a strict enforcement regime between 1998 and 2007 was a complete and utter failure? If the Bureau denies same, state all reasons for such denial, in detail.

The Bureau objects to this Interrogatory, including its subparts, on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence. The Bureau also objects to this Interrogatory, including its subparts, on the ground that it assumes facts not established. The Bureau further objects to the form of subparts c-h as they are more in the nature of requests for admissions and not proper interrogatories.

INTERROGATORY NO. 21: List the names, dates, and other pertinent identifying data of all frequency lotteries ever conducted by the Commission in which Riley Hollingsworth had any role.
a. As to each such frequency lottery, specify what Mr. Hollingsworth's position and exact duties were with respect to same.
b. Does the Commission claim that the lotteries, in which Hollingsworth played a role, resulted in as much remuneration to the Commission as it had anticipated prior to the lottery in question?
c. Did not one or more of the lotteries, in which Mr. Hollingsworth played a role, result in less remuneration than anticipated by the Commission, due to Mr. Hollingsworth's incompetence in conducting same?
d. Was Mr. Hollingsworth ever punished or disciplined by the Commission for incompetently performing his duties in connection with said lotteries?
e. If Mr. Hollingsworth was ever so punished or disciplined, provide full particulars of the reason therefore and the punishment or discipline imposed on him.

f. Was not Hollingsworth's incompetence in conducting frequency lotteries the reason why he was demoted to "S.C.A.R.E." in or about 1998?

The Bureau objects to this Interrogatory, including its subparts, on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence. The Bureau also objects to this Interrogatory, including its subparts, on the ground that it is vague. The Bureau further objects to subpart d on the ground that it assumes facts not established.

INTERROGATORY NO. 22: Does the Bureau contend that Part 97, §97.1 allows the Commission to regulate the substantive nature of on-the-air statements made by amateur radio operators?

The Bureau objects to this Interrogatory on the ground that it calls for a legal conclusion.

INTERROGATORY NO. 23: Does the Bureau contend that Part 97, §97.1 allows the Commission to regulate alleged "intentional interference" by amateur radio operators?

The Bureau objects to this Interrogatory on the ground that it calls for a legal conclusion.

INTERROGATORY NO. 24: If the answer to Interrogatory No. 22 is in the affirmative, state any and all legal bases for the Bureau's said claim including, but not limited to, the language of §97.1 that supposedly allows the Bureau to regulate intentional interference and the legislative history of §97.1 which the Bureau contends supports its said claim, as well as any reported Commission or Court decisions so construing §97.1.

The Bureau objects to this Interrogatory on the ground that it calls for a legal conclusion.

INTERROGATORY NO. 25: If the answer to Interrogatory No. 22 is in the negative, then under what authority did Riley Hollingsworth send Applicant his August 21, 2000 letter claiming that the substantive nature of his transmissions violated §97.1?

The Bureau objects to this Interrogatory on the ground that it calls for a legal conclusion.

INTERROGATORY NO. 26: If the answer to Interrogatory No. 23 is in the affirmative, state any and all legal bases for the Bureau's said claim including, but not limited to, the legislative history of §97.1 which the Bureau contends supports its said claim, and any reported Commission or Court decisions so construing §97.1.

The Bureau objects to this Interrogatory on the ground that it calls for a legal conclusion.

INTERROGATORY NO. 27: If the answer to Interrogatory No. 23 is in the negative, then under what authority did Riley Hollingsworth send Applicant his August 21, 2000 so-called "warning letter" claiming that his alleged "interference" violated §97.1?
a. Is it not true that Applicant was, in fact, *not* in violation of any specific section of Part 97, and that, in order to try to "S.C.A.R.E." Applicant, Hollingsworth was reduced to attempting to claim a violation under §97.1 because he couldn't find any *other* section of Part 97 that conceivably applied to Applicant's on-the-air conduct?
b. If the Bureau claims that subsection (a) of this Interrogatory is untrue, then why didn't Hollingsworth claim in said August 21, 2000 warning letter to Applicant that he had violated any *other* Section of Part 97?
c. It was merely a sloppy form letter of press release, wasn't it, which failed to state a Part 97 violation?
d. Since the August 21, 2000 letter failed to state a Part 97 violation, why was Applicant not therefore entitled to deny any such non-existent violation without being considered to have "bad character"?

The Bureau objects to this Interrogatory, including its subparts, on the ground that it calls for a legal conclusion. The Bureau also objects to the form of subparts a and c as they are more in the nature of requests for admissions and not proper interrogatories. The Bureau further objects to subparts a-d of this Interrogatory on the grounds that they are argumentative and assume facts not established.

INTERROGATORY NO. 28: Does the Bureau contend that Applicant evinced "bad character" by pointing out in his August 31, 2000 letter to Mr. Hollingsworth that the Bureau has no authority to regulate "intentional interference", or to control the substantive content of amateurs' on-the-air speech, under §97.1?
a. If the Bureau does so contend, state all reasons why it believes that it shows Applicant's "bad character" for him to have pointed out said fact to Mr. Hollingsworth.

Crowell's renewal application was designated for hearing to determine, among other things, whether he possesses the requisite character qualifications to be and remain a Commission licensee. The basis for designating this issue for hearing is explained in the Hearing Designation Order.

INTERROGATORY NO. 29: Does the Bureau admit that, in order for an "intentional interference" violation to exist against an amateur station, there must have been a *substantial* interference or interruption; (i.e more than de minimus) of ongoing communications?
a. If the Bureau refuses to so admit, why does it so refuse, in detail?

The Bureau objects to the form of this Interrogatory on the ground that it is more in the nature of a request for admission and not a proper interrogatory. The Bureau further objects to this Interrogatory on the ground that it calls for a legal conclusion.

INTERROGATORY NO. 30: As to all incidents of alleged "intentional interference", state the name, call sign, business and residence addresses and telephone numbers of all amateurs with whom the Bureau claims Applicant interfered and the exact date, time and frequency of all such alleged "intentional interference".
a. As to each such alleged incident, state exactly how long (in minutes and seconds) the Bureau claims ongoing communications were interrupted by each separate alleged "interfering" transmission by Applicant.
b. As to each such alleged incident, state the exact nature of the communications which were allegedly interrupted; i.e., what words, exactly, were prevented from being communicated by and between the complaining stations?
c. Is it not true that, in fact, at all pertinent times Applicant kept his transmissions short (on the order of ten seconds), and that the other participants in the QSO could say anything they wanted to say after that 10-second period when Applicant was transmitting?
d. Was not the claim that Applicant intentionally interfered concocted by Riley Hollingsworth out of whole cloth, merely to retaliate against Applicant for pointing out his incompetence in enforcing the amateur service Rules?

The Bureau objects to the form of subparts c and d of this Interrogatory on the ground that they are more in the nature of requests for admissions and not proper interrogatories. The Bureau further objects to subpart d of this Interrogatory on the grounds that it is argumentative and assumes facts not established. Without waiving the foregoing objections, which are reserved, the Bureau directs Crowell's attention to Attachment A.

INTERROGATORY NO. 31. As to all alleged incidents of "intentional interference", state in detail all reasons why Riley Hollingsworth concluded that Applicant had violated Part 97 rather than concluding instead that the *complaining* stations had violated Part 97, §97.101(b) in refusing to permit Applicant to share the frequency.

The Bureau objects to this Interrogatory on the ground that it assumes facts not established. The Bureau further objects to this Interrogatory on the ground that it calls for a legal conclusion.

INTERROGATORY NO. 32. Does the Bureau deny that, when initially contacted by Hollingsworth in the year 2000 about his alleged violations, Applicant informed Hollingsworth that, approximately 6 weeks before, the issues had already been resolved to the mutual satisfaction of all amateurs involved, by the use of the amateurs' "self-policing" policy; in other words, we had resolved it ourselves; that he wasn't up to date on the occurrences, and that we therefore didn't require his assistance?
a. If the Bureau denies this, state all reasons, in detail, for your denial.
b. If the Bureau admits this, then why did Hollingsworth proceed to issue a Warning Notice to Applicant after all of the affected amateur operators had already resolved the matter to their satisfaction?

The Bureau objects to the form of this Interrogatory on the ground that it is more in the nature of a request for admission and not a proper interrogatory. Because the Interrogatory is improper and objectionable, the Bureau is unable to respond to subparts a and b.

INTERROGATORY NO. 33: Does the Bureau admit that, in cases with facts quite similar to those of Applicant, Hollingsworth has sometimes concluded that the claimed "interfering" station violated Part 97, §97.101(d), while in other cases having the same or similar facts, he has concluded that the "complaining" station violated Part 97, §97.101(b) by refusing to share the frequency with the alleged "interfering" station?
a. What criteria does Riley Hollingsworth utilize in determining, in a case of alleged "intentional interference" like the instant case, whether the alleged "interfering" station is in violation of §97.101(d) or the "complaining" station is in violation of §97.101(b) for refusing to share the frequency?
b. Isn't it true that there is absolutely no rhyme or reason to Mr. Hollingsworth's such determinations, thereby rendering his entire amateur radio enforcement scheme arbitrary and capricious?
c. Isn't it true that Mr. Hollingsworth makes such determinations based on purely subjective factors, such as whether he happens to *like* the "complaining" station or the "interfering" station better?
d. Does Hollingsworth admit writing, on or about October 9, 2002, the following" "Good amateur practice is hard to define. I'd have to say it's operating with the realization that the frequencies are shared, that there's going to be occasional interference and that's no reason to become hateful and paranoid."

The Bureau objects to the form of this Interrogatory, including subparts b-d, on the ground that it is more in the nature of a request for admission and not a proper interrogatory. The Bureau also objects to subparts a-c of this Interrogatory on the grounds that they are argumentative and assume facts not established. In addition, the Bureau objects to subparts b-d of this Interrogatory insofar as they exceed the bounds of permissible discovery as set forth in 47 C.F.R. § 1.311(b)(4).

INTERROGATORY NO. 34: Does the Bureau admit that only amateur operators who took their examinations from a Volunteer Examiner can be called in for re-examination by the Commission?
a. If the Bureau does not so admit, state in detail all the reasons why it refuses to so admit.

The Bureau objects to the form of this Interrogatory on the ground that it is more in the nature of a request for admission and not a proper interrogatory. The Bureau further objects to this Interrogatory, including its subpart, on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NO. 35: Does the Bureau admit that, in or about the period of 1998 through 2000, Riley Hollingsworth, in his capacity as "S.C.A.R.E.", notified certain amateur radio operators who had taken their examinations from an F.C.C. Regional Office's Engineer-In-Charge that said amateurs had to appear for re-test?
a. Did Riley Hollingsworth ever send Michael Delich, formerly WA6PYN (now deceased), a notice that he had to appear for a re-test before the Commission, even though Mr. Delich had taken his examination before the Engineer-In-Charge of the San Francisco Regional office of the Commission? If so, provide a copy of said notice to Mr. Delich.
b. What legal authority did Riley Hollingsworth have to send Mr. Delich, or any other amateur who took his test before the Engineer-In-Charge, such a notice for re-test?
c. Is it not true that, by sending out such illegal notices, Riley Hollingsworth acted in bad faith and abused his authority? If the Bureau denies this, state all reasons for such a denial in detail.
d. Is the Commission aware that, shortly after Mr. Delich received his illegal re-test notice from Mr. Hollingsworth, Delich suffered a fatal heart attack?
e. Does Riley Hollingsworth feel in any way responsible for the death of Mr. Delich? If not, why not?

The Bureau objects to this Interrogatory, including its subparts, on the grounds that it is more in the nature of a request for admission and seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence. The Bureau also objects to this Interrogatory, including its subparts, on the ground that it assumes facts not established. The Bureau also objects to subparts b and c on the ground that they call for legal conclusions.

INTERROGATORY NO. 36: Did Hollingsworth ever send a warning notice to any amateur service operators, alleging that they had violated Part 97 by transmitting single sideband audio of "excessive" bandwith?
a. If so, provide copies of all such warning notices.
b. What was the legal basis for such warning notices, in detail?
c. Does Hollingsworth admit that Part 97 contains no specific regulation concerning the bandwith of single sideband transmissions in the amateur service?
d. If Hollingsworth denies subsection (c) of this interrogatory, state exactly what section(s) of Part 97 gives the Bureau the right to regulate the bandwidth of single sideband transmissions in the amateur service, and the Bureau's exact legal rationale therefor, in detail.

The Bureau objects to this Interrogatory, including its subparts, on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence. The Bureau further objects to subpart a of this Interrogatory insofar as it requests the production of documents, which is impermissible pursuant to Section 1.325(a) of the Commission's Rules. The Bureau also objects to subpart b of this Interrogatory on the ground that it calls for a legal conclusion. In addition, the Bureau objects to the form of subpart c of this Interrogatory on the ground that it is more in the nature of a request for admission and not a proper interrogatory. In addition, the Bureau objects to subparts c and d of this Interrogatory insofar as they exceed the bounds of permissible discovery as set forth in 47 C.F.R. § 1.311(b)(4).

INTERROGATORY NO. 37: Did Riley Hollingsworth ever send a license modification order to amateur service station KC6PQW ("the KC6PQW order") that he was required to rescind or modify?
a. Is it not true that, in violation of §1.87 of the Commission's Rules, the KC6PQW order failed to specify an effective date?
b. Is it not true that, in violation of §1.87 of the Commission's Rules, the KC6PQW order failed to specify the Commission's findings and grounds, as well as the reasons for the purported modification?
c. Is it not true that, in violation of §1.87 of the Commission's Rules, the KC6PQW order failed to afford the licensee notice of his right to protest the order?
d. Is it not true that, in violation of §316 of the Act, the KC6PQW order attempted to levy an illegal sanction by not providing the licensee with the right to a hearing before the modification was imposed?
e. If the Bureau denies any of the subparagraphs of this interrogatory, state all factual and legal bases for such denial, including all decisions of the Commission and the courts on which the Bureau relies in denying same.

The Bureau objects to this Interrogatory, including its subparts, on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence. The Bureau further objects to this Interrogatory, including its subparts, on the ground that it is more in the nature of a request for admission and not a proper interrogatory. In addition, the Bureau objects to subpart e of this Interrogatory on the ground that it calls for a legal conclusion.

INTERROGATORY NO. 38: With respect to Mr. Hollingsworth's August 21, 2000 letter to Applicant, does the Bureau believe that so-called "unsolicited and unwanted comments" in a roundtable QSO constitute intentional interference?

Assuming the referenced correspondence relates to the August 21, 2000, letter identified in the Hearing Designation Order in this proceeding, the letter speaks for itself. The Bureau further objects to this Interrogatory on the ground that it calls for a legal conclusion.

INTERROGATORY NO. 39: If your answer to Interrogatory No. 38 is in the affirmative, then who decides if the comments of an amateur station during a roundtable QSO are "unsolicited and unwanted", and what legal basis exists for the person or entity to make such a decision? State any and all legal bases for the Bureau's said claim including, but not limited to, the legislative history of Part 97 which the Bureau contends supports its said claim, and any reported Commission or Court decisions so construing Part 97.

The Bureau objects to this Interrogatory on the ground that it calls for a legal conclusion.

INTERROGATORY NO. 40: If your answer to Interrogatory No. 38 is in the affirmative, then does the Bureau believe that it is necessary for an amateur station who seeks to participate in a roundtable QSO to be "acknowledged" by other stations before he has the right to participate therein?
a. Who must "acknowledge" the station that desires to participate in the roundtable QSO before that station has the right to participate in the roundtable QSO?
b. Must *all* the other stations participating in the roundtable QSO "acknowledge" each new station that wishes to participate therein, before the station wishing to participate has the legal right to do so?
c. If the Bureau believes that some, but not all, of the other stations participating in the roundtable QSO must "acknowledge" a station wishing to enter the QSO before he has the right to do so, then how many, or what proportion, of the participants in the roundtable QSO must "acknowledge" the station before he has the right to participate therein?
d. Where is this so-called "acknowledgement" requirement found in Part 97?
e. Why is one amateur radio operator required to seek the "acknowledgment" of another amateur operator before he can enter a roundtable QSO, when both amateur operators have an identical license grant entitling them to use the frequency in question, and §97.101(b) requires them to share their frequencies?
f. Does the Bureau claim that, under §97.101(b), the station first on the frequency doesn't have to share it with other stations? Where does such a policy appear in §97.101(b), or anywhere in Part 97, for that matter?

The Bureau objects to this Interrogatory, including its subparts, on the ground that it calls for a legal conclusion.

INTERROGATORY NO. 41: If the answer to Interrogatory No. 38 is in the affirmative, state any and all legal bases for the Bureau's said claim including, but not limited to, the legislative history of Part 97 which the Bureau contends supports its said claim, and any reported Commission or Court decisions so construing Part 97.

The Bureau objects to this Interrogatory on the ground that it calls for a legal conclusion.

INTERROGATORY NO. 42: What was the legal basis for Mr. Hollingsworth's claim, in his August 21, 2000 letter, that another amateur radio operator participating in a roundtable QSO with Applicant has the right to order Applicant to leave the frequency, and that Applicant must therefore change frequency or be guilty of so-called "intentional interference", when both amateur operators have an identical license grant entitling them to use the frequency in question and §97.101(b) requires them to share their frequencies?

Assuming the referenced correspondence relates to the August 21, 2000, letter identified in the Hearing Designation Order in this proceeding, the letter speaks for itself. The Bureau further objects to this Interrogatory on the ground that it calls for a legal conclusion.

INTERROGATORY NO. 43: State, in detail, the exact factual and legal differences between the instant case and that of amateur station W2VJZ, to whom Mr. Hollingsworth sent a warning notice on or about November 20, 2004, which led Hollingsworth to conclude that station W2VJZ was refusing to share the frequency under §97.101(b), but that the complainants referred to in Hollingsworth's August 30, 2000 letter to Applicant were *not* also refusing to share the frequency with Applicant.

The Bureau objects to this Interrogatory on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence. The Bureau further objects to this Interrogatory on the ground that it calls for a legal conclusion.

INTERROGATORY NO. 44: State, in detail, the exact factual and legal nature of the "compelling governmental interest", if any, that supposedly permits the Bureau to regulate so-called "indecency" in the amateur radio service.

The Bureau objects to this Interrogatory on the ground that it calls for a legal conclusion.

INTERROGATORY NO. 45: What theory of indecency does the Bureau believe should apply to Applicant's renewal?
a. Is a "fleeting expletive" actionable as indecency in the amateur radio service?
b. Is *scienter* required in order for an alleged indecent statement to become actionable in the amateur radio service?
c. As to both subparagraphs (a) and (b) of this interrogatory, state all legal bases for the Bureau's contention, including all legal decisions of the Commission and the Courts which support the Bureau's position.

The Bureau objects to this Interrogatory, including its subparts, on the ground that it calls for a legal conclusion.

INTERROGATORY NO. 46: Does the Bureau contend that an amateur service license may be granted, withheld, modified, suspended, revoked or not renewed based upon an unconstitutional premise?

a. If the Bureau does so contend, state all legal bases for such a contention, including all decisions of the Commission and the courts upon which the Bureau relies in so contending.

The Bureau objects to this Interrogatory, including its subpart, on the ground that it calls for a legal conclusion.

INTERROGATORY NO. 47: Does the Bureau claim that the same standard of so-called "indecency" applies to the broadcast services as applies to the amateur service?
a. If the Bureau so claims, state all reasons why the Bureau does so, including all legal bases for such a claim, including all decisions of the Commission and the courts on which such a denial is based

The Bureau objects to this Interrogatory, including its subpart, on the ground that it calls for a legal conclusion.

INTERROGATORY NO. 48: Does the Bureau claim that, *in the absence of a broadcast*, a "compelling governmental interest" permits the Bureau to regulate so-called "indecency" in the amateur radio service?
a. If the Bureau so claims, state, in detail, all legal bases for such a contention, including all decisions of the Commission and of the courts which supposedly allow the Bureau to regulate so-called "indecency" in a non-broadcast medium.
b. Does the Bureau admit, in view of §97.113(b), that the amateur radio service is *not* a broadcast medium?
c. If the Bureau denies subparagraph (b) of this interrogatory, state all reasons why the Bureau denies same, including all legal bases for such a claim, including all decisions of the Commission and the courts on which such a denial is based.

The Bureau objects to this Interrogatory, including its subparts, on the ground that it calls for a legal conclusion. The Bureau further objects to subpart b of this Interrogatory on the ground that it is more in the nature of a request for admission and not a proper interrogatory. Because the form of subpart b is improper and objectionable, the Bureau is unable to respond to subpart c.

INTERROGATORY NO. 49: Does the Bureau admit that, when Riley Hollingsworth became "S.C.A.R.E." in or about 1998, the Bureau effectively changed from a "restrained" or "benign" policy toward so-called "indecency" transmitted by amateur radio operators to a "strict" policy toward so-called "indecency"?
a. If the Bureau does not so admit, state all reasons, both legal and factual, why it does not.

b. If the Bureau does not so admit, doesn't this mean that Riley Hollingsworth totally failed to crack down on so-called "indecency"? If not, explain in detail why not.

The Bureau objects to this Interrogatory, including its subparts, on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence. The Bureau further objects to this Interrogatory on the ground that it is more in the nature of a request for admission and not a proper interrogatory. The Bureau also objects to this Interrogatory on the grounds it assumes facts not established.

INTERROGATORY NO. 50: Does the Bureau believe that, in or about 1998, the Commission was under any duty, pursuant to the Administrative Procedures Act (A.P.A.), 5. U.S.C. §§551, et sequitur, to examine the relevant data concerning so-called amateur radio "indecency" and to articulate a satisfactory explanation for changing from a "benign" enforcement regime to a "strict" enforcement regime regarding alleged "indecency" transmitted by amateur radio operators? See Motor Vehicles Manufacturers' Association of the U.S., Inc. v. State Farm Mutual Auto Insurance Co. 463 U.S. 29, at p. 43; 103 S.Ct. 2856; 77 L.Ed.2d 443 (1983) and Securities and Exchange Commission v. Chenery Corp., 332 U.S. 194, at p. 196; 67 S.Ct. 1575; 91 L.Ed.2d 1995 (1947).
a. If the Commission contends that it was not required to take such action in or about 1998 pursuant to the A.P.A., state all factual and legal bases for such a contention, in detail.
b. Does the Bureau claim that amateur radio operators were given any notice in or about 1998 that the Bureau was going to switch from a "benign" indecency enforcement regime to a "strict" one?
c. If the Bureau contends that, in or about 1998, amateur operators were placed on notice of the change in enforcement regimes, state in detail the means and methods by which amateur radio operators were so placed on notice.

The Bureau objects to this Interrogatory, including its subparts, on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence. Alternatively, te Bureau objects to this Interrogatory, including its subparts, on the ground that it calls for a legal conclusion.

INTERROGATORY NO. 51: Does the Bureau believe that the Commission was under any duty, pursuant to the Administrative Procedures Act (A.P.A.), 5. U.S.C. §§551, et sequitur, to examine the relevant data concerning entry into, and participation in, amateur radio service "roundtable QSOs" by amateur service stations, and to articulate a satisfactory explanation for distinguishing between "intentional interference" under §97.101(d), or instead a refusal to share the frequency in question under §97.101(b), when an amateur

station seeks to enter such a roundtable QSO? See Motor Vehicles Manufacturers' Association of the U.S., Inc. v. State Farm Mutual Auto Insurance Co. 463 U.S. 29, at p. 43; 103 S.Ct. 2856; 77 L.Ed.2d 443 (1983) and Securities and Exchange Commission v. Chenery Corp., 332 U.S. 194, at p. 196; 67 S.Ct. 1575; 91 L.Ed.2d 1995 (1947).
a. If the Commission contends that it was not required to take such action pursuant to the A.P.A., state all factual and legal bases for such a contention, in detail.
b. Does the Bureau claim that amateur radio operators were ever given any notice, at any time, concerning the Bureau's policy with respect to whether a station seeking to participate in a roundtable QSO was guilty of "intentional interference" under §97.101(d), or the other stations were instead guilty of a refusal to share the frequency in question under §97.101(b)?
c. If the Bureau contends that amateur operators were ever placed on notice of its policy with respect to whether a station seeking to participate in a roundtable QSO was guilty of "intentional interference" under §97.101(d), or the other stations were instead guilty of a refusal to share the frequency in question under §97.101(b), state in detail the means and methods by which amateur radio operators were so placed on notice.

The Bureau objects to this Interrogatory, including its subparts, on the grounds that it seeks information that is neither relevant to the matters here in issue nor reasonably calculated to lead to the discovery of admissible evidence. Alternatively, the Bureau objects to this Interrogatory, including its subparts, on the ground that it calls for a legal conclusion.

INTERROGATORY NO. 52: Does the Bureau admit that, in all of Riley Hollingsworth's warning letters to Applicant, the Bureau threatened Applicant with prosecution under Title 18 of the U.S. Code, §1001 and Title 47 of the C.F.R., §1.17, if the Bureau did not deem Applicant to be sufficiently candid in his reply thereto?
a. If the Bureau denies this, state all reasons for your denial in detail.

The Bureau objects to this Interrogatory on the ground that it is more in the nature of a request for admission and not a proper interrogatory. Furthermore, the correspondence to which Crowell may be referring speak for themselves.

INTERROGATORY NO. 53: State each and every reason why the Bureau apparently believes that Applicant has "bad character"; all facts supporting each such claimed reason; and the exact legal basis for said claim, including the legislative history of the "Character Rule" doctrine and all legal decisions (whether from the Commission or the courts) supporting the proffered application of the so-called "Character Rule".

The Bureau objects to this Interrogatory on the ground that it calls for a legal conclusion. The issue of whether Crowell possesses the requisite character qualifications to be and remain a Commission licensee is among the issues designated for hearing in this proceeding.

INTERROGATORY NO. 54: Does the Bureau admit that part of its allegation that Applicant has "bad character" is based on its belief that, in effect, Applicant was *too candid* in replying to Hollingsworth's warning notices?
a. If the Bureau does so admit, does the Bureau feel it is legally permissible to threaten a licensee with criminal prosecution if he is not candid enough in his replies to such warning notices, and then attempt to deny renewal of his license on the theory that he was *too candid*?
b. How, exactly, did Applicant's responses evince any "bad character"?

The Bureau objects to this Interrogatory on the ground that it more in the nature of a request for admission and not a proper interrogatory. The Bureau further objects to this Interrogatory, including its subparts, insofar as it assumes facts not yet established. Additionally, the issue of whether Crowell possesses the requisite character qualifications to be and remain a Commission licensee is among the issues to be determined in this proceeding.

INTERROGATORY NO. 55: Does the Bureau admit that, at all pertinent times, Applicant was entitled by his license grant to transmit on the frequencies on which the Bureau's alleged Part 97 violations occurred?
a. If the Bureau denies this, state all reasons for your denial in detail.

The Bureau objects to this Interrogatory on the ground that it is more in the nature of a request for admission and not a proper interrogatory.

INTERROGATORY NO. 56: Does the Bureau deny that Applicant has been an amateur service licensee since he was 13 years of age, in 1960 (except for a 7-year period between 1967 and 1976, when Applicant was in college and law school)?
a. If the Bureau denies this, state all reasons for your denial in detail.

The Bureau objects to this Interrogatory on the ground that it is more in the nature of a request for admission and not a proper interrogatory.

INTERROGATORY NO. 57: Does the Bureau admit that Applicant held the call sign "WV6LSF" as a Novice class operator between 1960 and 1961, and during said period received no notices of violation from the Commission?
a. If the Bureau denies this, state all reasons for your denial in detail

The Bureau objects to this Interrogatory on the ground that it is more in the nature of a request for admission and not a proper interrogatory.

INTERROGATORY NO. 58: Does the Bureau admit that Applicant held the call sign "WA6LSF" as a General class operator between 1961 and 1967, and during said period received no notices of violation from the Commission?
a. If the Bureau denies this, state all reasons for your denial in detail.

The Bureau objects to this Interrogatory on the ground that it is more in the nature of a request for admission and not a proper interrogatory.

INTERROGATORY NO. 59: Does the Bureau admit that Applicant took and passed his General class amateur exam in 1961 from then San Francisco Regional F.C.C. Office Engineer-In-Charge Landry, including a 13 word per minute C.W. test (both sending and receiving), and that Mr. Landry at said time and place informed Applicant that he had a "good fist"?
a. If the Bureau denies this, state all reasons for your denial in detail.

The Bureau objects to this Interrogatory on the ground that it is more in the nature of a request for admission and not a proper interrogatory.

INTERROGATORY NO. 60: Does the Bureau admit that Applicant is a proficient CW (code) operator, and that he possesses a Code Proficiency Certificate from the American Radio Relay League memorializing that he can copy CW at 25 words per minute?
a. If the Bureau denies this, state all reasons for your denial in detail.

The Bureau objects to this Interrogatory on the ground that it is more in the nature of a request for admission and not a proper interrogatory.