

I am submitting this letter in support of waiver (with modification) to allow Amateur Radio use by hospital employees during emergency exercises and drills.

I would encourage the FCC to permit properly licensed amateur radio operators under the following descriptions/classifications, to operate on behalf of their employers during public safety related drills and exercises:

- a. Municipal, County, State and Federal Emergency Managers and their employees
- b. Police
- c. Fire
- d. Emergency Medical Personnel
- e. Hospitals
- f. Any other Municipal, City, County, State, Federal employees whose job descriptions directly relate to public safety

Utilization of Amateur Radio should be allowed for drills, exercises, and actual emergencies where Amateur Radio communications are an integral part of planning, response, and recovery operations.

I advise against allowing blanket waivers, without limitations, for Hospital and/or public safety related drills as this may set a precedent for communications on behalf of an employer for a pecuniary benefit to the employer. Such conditions may encourage employees to obtain their amateur licenses for the sole purpose of serving the benefit of the employer.

I suggest that the waiver include the following stipulations:

1. All emergency training exercises and drills falling under the waiver must be under the direction of a public safety agency.
2. Properly licensed amateurs who participate in the emergency training exercises and drills must demonstrate that they have been active amateurs, outside of their participation in drills under the direction of the public safety agencies. This could be demonstrated by active membership in an amateur radio club, regular participation in amateur radio drills and nets, and other operating activities such as contesting and casual contacts, which could be validated with radio logs and radio contact confirmations (QSL Cards) etc.
3. The waiver make no distinction based on whether the employees, managers or directors are on paid duty or off the clock.

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