

I am filing opposing the AHA request for a blanket waiver. Accreditation is a commercial and professional certification and does not directly relate to the providing of emergency services to the public. Its benefit is mostly financial to the hospital, many of which are for-profit entities. Also, accreditation does not specifically require the use of amateur radio operators to provide backup communications. Amateur radio was selected because it is the cheapest of the possibilities. Amateur has low cost radios (usually provided by the amateur himself) and free volunteer labor.

It is interesting to note the new phenomenon of hospital employees appearing to become interested in radio communications. Amateur radio has historically attracted people from many professions, but what we have now is hospital employees being encouraged, enticed, or possibly even required to get amateur radio licenses to provide to the hospital a low cost backup communications system.

Compared to the many other administrative burdens that hospitals face (health insurance, billing, licensing, payroll, taxes, etc.), filing periodic waivers to the FCC is trivial. It may be that the purpose of this blanket waiver request is to hide how many hospital employees have become amateur radio operators solely for this purpose.

Amateur radio has provided emergency communications for many decades to any public safety organization that has needed it. There has never been a need to grant waivers before. This is an artificial need created by hospitals recruiting its employees into amateur radio for its low cost.