

To the Honorable Commissioners,

I would suggest putting all emergency operations and drills under the aegis of the RACES banner as far as dealing with paid operator for this reason:

1. RACES (Radio Amateur Civil Emergency Service) has some strict time limits on drills and operations which lend them selves quite nicely to controlling and abating the abuses which a paid operation service could wreck on Amateur Radio Service without these checks and balances to control abuse such as limits on drills.
2. Since RACES is a local service with control at the State or local level, the locality is in a better position to oversee the Emergency Operations and drills and to police their own rather than adding a paid radio amateur to the general population with no oversight.

I would suggest visiting Section 407 and amending the same to read:

(a) No station may transmit in RACES unless it is an FCC-licensed primary, club, or military recreation station and it is certified by a civil defense organization as registered with that organization, or it is an FCC-licensed RACES station. No person may be the control operator of a RACES station, or may be the control operator of an amateur station transmitting in RACES unless that person holds a FCC-issued amateur operator license and is certified by a civil defense organization as enrolled in that organization. A control operator may be a person who is an employee any agency, either governmental, non-Profit, or profit while the station is being operated on behalf of a RACES operation in a drill or Emergency.

I wish to revisit this matter and further clarify my earlier comments.

I Remain,

Sincerely,

s/

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