

I wholeheartedly support the proposed changes in Part 13, and commend the Commission on taking the time and effort to streamline and clarify these operator licenses.

Looking first at the proposal to create a new Radiotelegraph Operator's License (which I abbreviate here as RTOL) to replace the existing three classes, this appears to be a reasonable change. Ceasing issuance of the First Class Radiotelegraph Operator's License, with its mandatory one year of service requirement, is justified. As noted on page 3, paragraph A4, it has become virtually impossible for members of the public to meet this criterion. On the other hand, beyond the code test a Third Class Permit requires only a simple written exam and, as noted in A5, conveys very limited authority. It therefore makes sense to end its issuance as well. These changes would be analogous to the creation of the General Radiotelephone Operator License (GROL) in the 1980s, which replaced the First and Second Class Radiotelephone licenses, and ended the Third Class Permit.

One issue that should be considered is whether allowing existing licenses to expire and then renewing them as RTOLs would force the Third Class Permit holders to either upgrade or lose their written element 5 and code exam credits as well as their permits. In paragraph A6 the NPRM only discusses renewing "licensees". Renewing a Third Class as a RTOL would allow the applicant to skip the element 6 written examination, which is clearly not the intention of this proposed change.

Also, for First Class holders the general migration to an RTOL would mean the cancellation of their substantial achievements in obtaining this rare and historic category. Placing them with Second Class holders in the new RTOL category would be an unfortunate negation of their status.

A way around these difficulties is to make all current and valid licenses and permits good for the lifetimes of their holders, as occurred in 2006 with all Marine Operator Permits (MROP) and GMDSS certificates. Effectively this means that Second Class licensees would retain their status by now holding the equivalents of RTOLs. They could turn in their old licenses for new certificates, hopefully without cost. In the mid-1980s lifetime GROL diploma certificates were issued to licensees in this manner. First and Third holders would remain licensed in a way that parallels the Novice and Advanced Amateur licensees who can retain their certificates although no new ones are now issued.

I therefore formally endorse the suggestion raised in paragraph A7 that new and existing licenses be issued or extended without expiration dates. Since further testing does not occur there is no need for holders to continue renewing them. This current process creates an unnecessary burden on both them and the Commission.

I also agree with the proposal to rewrite paragraph A8, removing the prohibition on holding a Restricted Permit with either a MROP or a Radiotelegraph license. There is no reason for this rule to

remain.

I further strongly agree with the Commission's proposals to eliminate the restrictive endorsements, as was outlined in paragraphs A9 and A10. For the former, there is no evident reason why these limiting endorsements should remain on today's GROL and MROP certificates. For the latter, the issue of determining a restrictive disability is clearly beyond the scope of the COLEM examiners. Nor is it possible for the Commission to assess disabilities that licensees may later acquire. Should the rules be so amended, I also suggest that for existing licensees all of these endorsements be automatically removed from the FCC database.

Also, to fully harmonize the rules, and in line with the change proposed in paragraphs A8 and A9, I strongly recommend amending 13.8 to state that the holder of any certificate issued under this Part has the authority granted by a Restricted Permit. Unlike every other operator's certificate, there is no test for this permit. It therefore seems appropriate that someone who has demonstrated additional knowledge should always be granted the authority of the pro forma permit card. In the past the Radiotelephone licenses and permits specifically include this power, but at this time only the Radiotelegraph ones do. By standardizing the rules this could conceivably avoid difficulties if a marine or aviation operator was checked in another country and found to have a MROP, GROL, or GMDSS license but not the expected Restricted Permit.

I also agree with paragraph A11 on the request for current mailing addresses. This should not be a burden on the licensees and is in line with other FCC and FAA rules.

Finally, the proposed amendment of part 13.8 (page 16) seems to imply that the First Class Radiotelegraph Operator's License has more authority than the Second Class or the new RTOL. Reading them in order it appears in paragraph (a) that the First Class licensee has the authority of the other two, but in paragraph (b) the Second Class holder only has the authority equal to the RTOL and below. I do not believe retaining this hierarchy is the intention of these proposed revisions, and suggest that the wording in the first paragraph be clarified.

In the early 1950s the Commission suspended, and later revoked, the requirement for time in service before a Radiotelephone Operator's License could be renewed. Since then the general trend has been to make commercial operator licenses easier to hold. The proposed changes in the regulations simply carry this process to its logical conclusion. I hope that serious consideration is given to implementing all of them.