

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the matter of)
)
Amendment of the Commission's Rules) WT Docket No. 10-177
concerning Commercial Radio Operators)

COMMENTS OF JOHN COVINGTON

Date: September 28, 2010

1. *Introduction.* This document contains my responses to the notice of proposed rulemaking. I hold both a Second Class Radiotelegraph Operator's Certificate and a General Radiotelephone Operator License, so the outcome of this proceeding will directly affect me. I am in general agreement with the proposals outlined in the NPRM, but suggest some possible alternatives.
2. *Radiotelegraph License Term.* I prefer a lifetime license. The only reason I can see that the radiotelegraph license requires periodic renewal is to update the photograph. However, I think the photograph was originally required for reasons that are now lost to history. This process is somewhat burdensome; I am presently going through the renewal process myself and have now sent my second set of photographs due to a problem with the first set. None of the other commercial licenses require photographs. I hold several other permits and licenses which do not have photographs of their own, but are considered valid when presented along with a photo ID (such as a driver's license or passport). Dispensing with the photograph would allow the radiotelegraph licenses to easily become lifetime licenses. If the Commission desires to maintain a shorter license term or a license with photographs, then I suggest that the ten-year period suggested in the NPRM is better than the present five-year term. It reduces the burden on the Commission and the licensee by half compared to the present term.
3. *Consolidation of First and Second Class Radiotelegraph.* I support the consolidation of the First and Second Class Radiotelegraph Certificates as you propose. There is no compelling reason to have them both available for new licenses issued today. The practical differences between them are small, and the service requirement remains the most significant difference for qualification.
4. *Alternative for First Class.* While I prefer a streamlined license structure, I know there is some value in recognizing past achievements. An alternative that would accomplish this would be to simply issue no more new First Class licenses, and renew the existing ones for the lifetime of the holder. The Second Class would still be renamed as suggested in the NPRM and become the only new radiotelegraph license that would be issued.
5. *Alternative for Third Class.* In paragraph 5 of the NPRM, it is stated that the Third Class Radiotelegraph Operator's Certificate as a practical matter now conveys the same operating authority as the Marine Radio Operator Permit (which paragraph 8 of the NPRM states that radiotelegraph operators may not presently hold). Since holders of the Third Class are very small in number (58 active licensees as of September 28, 2010; 20 of which are expired

but within the grace period for renewal), I suggest that they could either be administratively renewed for a lifetime term, or renewed as MROPs, which have a lifetime term.

6. *Alternative Radiotelegraph License Name.* I propose that the new name for the Second Class be the *Radiotelegraph Operator's License* instead of the Radiotelegraph Operator's Certificate. Throughout both the Part 13 rules and the NPRM, holders of these certificates are referred to as licensees rather than certificants; license terms are listed rather than certificate terms, and so forth. These are described as licenses in every context except literally their name. All of the other commercial radio operator licenses requiring examination, except the Marine Radio Operator Permit, are called licenses rather than certificates.
7. *Restrictive Endorsements.* I favor repealing the restrictive endorsements mentioned in the NPRM. Endorsements should be present on a license to indicate superior or restricted authority compared to that conveyed by the base license. Since the base license does not offer broadcasting authority to begin with, and has not for many years, listing this restriction is about as useful today as stating that the license does not convey the authority to hunt or fish.
8. *Uncorrected Physical Handicaps.* I agree that the employer should make the decision whether an operator is able to perform specific duties. A person's physical handicaps may improve or deteriorate after the license is issued, and the decision is one that should be made based on present condition rather than that person's condition at the time of issuance of the license.

Sincerely,

John Covington
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