

BEFORE THE FEDERAL COMMUNICATIONS COMMISSION

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| In the Matter of | } | |
| | } | |
| Amendment of the Amateur Service Rules | } | |
| Governing Qualifying Examination Systems | } | |
| and Other Matters | } | |
| | } | |
| Amendment of Party 97 of the Commission's | } | Docket No.: 12-283 |
| Amateur Service Rules to Give Permanent | } | |
| Credit for Examination Elements Passed | } | |
| | } | |
| | } | |
| Amendment of the Amateur Service Rules | } | |
| Governing Vanity and Club Station Call | } | |
| Signs | } | |

Comments of Stephen E. Reinen, N8BP on behalf of the McKinney, TX VE Team

Introduction

I am the Session Manager for the McKinney Volunteer Examiner Team (VE Team), which is sponsored by the McKinney Amateur Radio Club, of which I am on the Board of Directors and have been serving in the capacity of Editor for the last three years. I hold an FCC Amateur Radio License of Amateur Extra class, and have been licensed for over twenty years. The following McKinney VE Team members provided feedback on the following comments: Marvin Arnold (K5MRA), Charlotte Arnold (KC5TA), Keith Broce (KT5AA), Charles Hair (K5TKY), Clark Hansen (AE5WD), Pete Lovall (AE5PL), and Stephen Reinen (N8BP).

Comments

The following comments have been compiled and reviewed by our team with regards to specific points raised in the commission's notice. The absence of comments by our group on any given item does not necessarily indicate our agreement with said items, and we reserve the right to make additional comments as the need occurs. Each comment references the applicable paragraph numbers in the Notice of Proposed Rule Making and Order.

Examination Credit (Paragraph 4)

The McKinney VE Team does not agree that expired licensees should be able to administratively renew without re-testing at any point after the grace period has expired. The length of the grace period (addressed later in this document) could be adjusted to accomplish a better window if the commission feels that two years may not be sufficient.

We feel that licensees who (using the example in paragraph 5) have allowed their grant to expire 20 years ago should retest. The current tests are not the same as those given 20 years ago; neither is the technology used, bandwidth allocated, or (possibly) the relevant rules for the grant class. The wider the gap in years, the more these changes would be relevant.

We believe a person who maintains their license is likely to be active in the service, or otherwise aware of the changes as described above relating to relevant technology, rules, etc. One who allows their license to expire and does not renew within the grace period, is most likely not active and therefore may not be aware of changes that have occurred since they were active.

This item can easily be compared to an automobile driver's license. We assume it would be generally agreed that after getting your driver's license (if it were to expire) you would not have lost the basic skills required to drive, however though rules vary from state to state, here in Texas, if you allow your license to expire and do not renew it within two years, you must "start over again as a first time applicant"; in addition Alaska does not have a grace period. Once your license is expired, it is not legal for you to drive. If you allow your license to expire over a year, you would need to pass the written test again in order to renew your license.

Validity of CSCEs (Paragraph 10)

Since none of the Amateur Radio license classes require passing multiple elements to be given a license grant, the 365 day validity limit is actually overkill. The CSCE represents a proof of passing in the event paperwork fails to process correctly, and under most all circumstances would be acted on within six weeks of passing the exam element if the applicant doesn't receive their grant notification.

We feel the 365 day lifespan should remain in force, as multiple element license requirements may be required in the future, however extending the lifespan of the CSCE's validity will add to the administrative effort. Currently our VE team (and VEC) keeps CSCE records for at least 2 years, if the expiry is eliminated; we would have to keep paperwork indefinitely to ensure that verification can be completed. Aged CSCEs may be difficult to authenticate if presented years after element completion. Upgraded operators would have the potential of continuing to operate under the CSCE when paperwork is lost, possibly discouraging any follow up by the operator to correct the records since the CSCE gives them the authority to operate.

Grace period for renewal (Paragraph 12) and Vanity call sign waiting period (Paragraph 14)

The McKinney VE Team feels that allowing expired licensees to re-establish an expired license administratively after an extended period of time is not advisable. We feel that the current two year grace period is sufficient time for an interested party to renew their 10 year license, however since the commission is considering modifications, we would encourage an extension of the two year grace period to five years which should be enough time for anyone to recover their license. Further with reference to Paragraph 14, wherein it is proposed that the timeframe that call signs be placed back into the pool for reassignment, from experience we can advise that the current two year waiting period is on the border of being too short. For Example; when I applied for and was awarded the call N8BP in April of 2009, I began and continued to receive contact confirmation (QSL) requests for the original holder of the license

(Berthold Paulie) who had died in March of 2008. The QSLs continued to come in for about a year, to which I responded to each advising with regret that Bert had become a Silent Key. Bert's call sign license had expired April 2, 2007; my application for N8BP was granted on April 21, 2009; just over the two year waiting period.

Number of VEs (Paragraph 20)

We believe that the reduction of the requirement of three VEs minimum to anything less would increase the risk of error and fraud by too great a degree to be viable. The requirement of three Examiners has served us all (VE Teams, VECs, and the FCC) well since the inception of the VE system. Other methods should be considered if it is determined that there is a large pool of applicants that cannot find a test session within a few weeks of when they are targeting to test.

Remote Testing (Paragraph 22)

We feel that remote testing (in general) would increase the complexity of administering the exams if implemented as a requirement by the FCC that we must provide a remote exam if requested. However to address the goals and efforts to increase the availability of testing sessions as described in (Paragraph 20), remote testing could be conceived and structured to be available only when no other means are available, as in remote locations such as Alaska where the general population is lower and therefore the population of licensed VEs is lower still.

To be successful, and maintain the three VE standards, there would need to be at least two VEs physically at the remote location. The camera MUST be able to capture all applicants and all applicants should not be allowed to exit the camera view until they hand in the test. These rules would need to be required to ensure that the remote applicant was being assisted off camera. In addition, the VE

monitoring the session via video link would have to be dedicated to that task (when a split session was being executed).

One of the VEs at the remote location will need to act as the Session Manager (for post processing of the paperwork) as already defined in the rules for multi room sessions.

Respectfully Submitted,

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