

97.19(c)(1) Application for a vanity call sign.

With regard to expired licenses, 180 days following such expiration seems a relatively short period if the Commission intends to allow the licensees to reapply for their station call signs anyway. Particularly in view here are those former licensees who may be unable to renew in a timely way because they are military personnel located in a war zone. They may require more than six months in order to access the regular mail or Internet systems required for timely renewal.

In order to accommodate these and other former licensees in an orderly and, it must be said, fair way, a one-year grace period should apply between the expiration of a license grant and the possible reapplication cut-off date. Such a period will allow most, if not all, former licensees time both to access the proper forms necessary and to make the decision to reapply for their former call signs.

97.505(a) – (e) Element credit.

An examinee for a new or their own expired license grant should receive credit for all elements represented by genuine documents in their possession, whether those documents represent former license grants or examination credit duly granted by VEC/FCC action.

There seems little advantage to the FCC or the public in retesting former holders in good standing of license grants for the same elements they once passed in order to obtain those grants. More money, resources, and volunteer examiner (VE) time are expended in retesting than should be the case, and the FCC continues to evaluate new documents from those former license holders attempting to regain their status as active Amateur Radio Service operators.

97.509(a) Administering VE requirements.

While it is understood that situations may arise in which finding sufficient VEs (three at present) is difficult or nearly impossible, this is not the case in the majority of examination sessions.

At most sessions, it is difficult to manage every aspect of the session without three VEs grading examinations and one or two VEs being available to examinees around the room. It seems prudent to keep in mind that a minimum of two VEs may threaten the system's veracity, in that two people may more easily agree on an unwise and potentially harmful course of action than three people.

For the reasons stated above, both as to workload and honesty, the Commission should retain the requirement that a minimum of three VEs are necessary to run an examination session.