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

In the Matter of		
	)	
Amendment of the Amateur Service Rules	)	**WT Docket No. 12-283**
Governing Qualifying Examination Systems	)	
and Other Matters	)	
	)	
Amendment of Part 97 of the	)	**RM-11629**
Commission's Amateur Service Rules to	)	
Give Permanent Credit for	)	
Examination Elements Passed	)	
	)	
Amendment of Part 97 of the	)	**RM-11625**
Commission's Rules to Facilitate Use in	)	
the Amateur Radio Service of Single Slot	)	
Time Division Multiple Access	)	
Telephony and Data Emissions	)	
	)	
Request for Temporary Waiver	)	**WT Docket No. 09-209**
Amendment of the Amateur Service Rules	)	
Governing Vanity and Club Station Call	)	
Signs	)	

To the Commission:

Comments of Christopher Vince, KB8IHG

I am an Extra Class amateur radio operator (call sign KB8IHG). I have been licensed since 1989. I am currently attending Kent State University working towards a Bachelor's Degree in Computer Science. I am a veteran of the United States Marine Corps. And currently hold the title of 2nd Vice Commander for the 14th District of the Ohio American Legion.

My Comments

I am commenting on several of the issues raised in these dockets. Each of my comments references the applicable paragraph numbers in the Notice of Proposed Rule Making and Order.

Number of VEs

I prefer the current practice of having a team of three volunteer examiners (VEs) (Paragraph 18). This type of team is well suited to run an orderly and well supervised examination system. However, I am a resident of an area where it is relatively easy to collect a team of three VEs. There are many areas of the United States where the population density is low. As a result of this, there is a strong argument for a minimum team of two properly credentialed VEs. This approach also is compatible with my suggestion on remote testing that is presented below.

Remote Testing

I support to a *very* limited degree the idea of remote testing where a volunteer examiner (VE) supervises an examination by electronic means (Paragraph 22). This approach can be quite useful in less accessible locations such as Alaskan towns, Arctic and Antarctic bases, certain military bases etc. These remote sessions should include the use of an audio and video system that allows the distant examiner to supervise the session.

However, there should be a second VE present in person at the test session. This second VE compensates for the fact that the electronic system provides only tunnel vision and limited coverage of the examination session. The second examiner has a full view of the examination room, checks the identification of the applicants, and takes possession of the examination papers after the session is completed.

This system requires two examiners for the examination session, but one of the examiners can be present by means of a modern audio and video communications system.

Emission Types

The Commission asks for comments on any other specific emission types that should be permitted (Paragraph 28). In this regard, the Commission should consider the creation of a sub-band on an amateur radio band where any type of emission is allowed. This regulatory feature would allow any licensed amateur radio operator who is an inventor to test his or her new radio invention on the air. All of the amateur operators using this exploratory sub-band would be

required to identify every ten minutes by sending their call signs and a 50-character or less description of their experimental communications. This extended identification would be transmitted by Morse code, Single Side Band voice, or radio teletype.

Having a completely open emission type sub-band would significantly encourage innovative approaches to radio and new ham radio inventions. Experimenters and inventors would be able to work with new types of digital emissions as well as hybrid analog-digital communications modes. The exploratory sub-band system would accommodate new inventions that we do not understand right now. It is an open environment for such invention and development.

Respectfully submitted,

Christopher Vince, N3NL Amateur Radio Extra Class
6615 Cleveland Rd., Lot A8
Ravenna, Ohio 44266-1873

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