

Comments on
NOTICE OF PROPOSED RULE MAKING AND ORDER FCC 12-121
Adopted October 1, 2012 and released October 2, 2012

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

My name is Michael A. Higgins and I am an extra class licensed amateur radio operator holding the call sign KA6IYS. I have been an accredited Volunteer Examiner with the Greater Los Angeles Amateur Radio Group since August 24, 1984. I have the following comments on the above matters:

Permanent Credit for Examination Elements Previously Passed.

I do not oppose the changes being proposed. I do feel that anyone who has previously passed an examination element will most likely retain the same level of knowledge whether they renew their license or let it lapse. Many hams I know are inactive from time to time and come back to the hobby as their personal situation changes and their interests change. Having to retake an examination only hinders them from again becoming an asset to the amateur radio community. Having been a VE for many years I do not feel that the risk of someone using another person's expired license to gain element credit is any greater than just falsifying an address change and assuming their identity on the air with a fraudulently obtained license.

Validity of CSCE's.

I believe that the current expiration of 365 days should be retained. These documents by nature are designed to be temporary and allow operation until such time as the FCC receives notification from the Volunteer Exam Coordinator that the exam elements were passed and the appropriate paper work is complete. With the elimination of Morse Code as a requirement the only time additional elements must be passed is if a non-licensed person passes Element 3 or Element 4 without first passing Element 2 or a licensed person passes Element 4 before passing Element 3.

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Grace Period for Renewal

If the permanent credit for examination elements previously passed is enacted I feel that the reduction to 180 days is appropriate. This would also allow the FCC to purge unwanted and expired records from its database sooner. If corresponding changes are made in the Vanity Call Sign program the individual would have the opportunity to reclaim their old call sign if it has not been reissued.

Vanity Call Sign Waiting Period

I feel that this period should match the grace period for renewal.

Examination Administration

I do not support lowering the number of examiners required to hold a test session. Any less than three opens the door to fraudulent activity. I realize that the same thing can, and has, happened with the current rules; however, I feel less than three increases the potential for abuse beyond an acceptable level. Should the Commission decide to amend this rule to a lower number they should put in place other safeguards to protect the integrity of the system. Perhaps by limiting the number of sessions a VE team may give in a year with less than three examiners present and requiring that justification be provided to the VEC by the VE team prior to the session being held.

Remote Testing

I feel that remote site testing with video monitoring falls in the same category as lowering the number of examiners required at a session. You must have at least one custodian of the testing materials on site. You must also have at least one person on site to pick up and grade the papers. If you allow video oversight you are opening the door to manipulation of the system as you can only see and hear so much from a remote location. I do not think the benefit for the few that would be accommodated outweighs the risk to the entire program.