

From John C Wilson KØIP

First I want to state my intention to be direct and to the point, not beating around the “bush” to sound politically correct. Therefore, I will attempt to make it to the point, which might step on some toes, but only a few will be broken in the process.

I'm making NO comments about the TDMA / Data emissions request by the ARRL. I do not have a working knowledge of this type of technology, So I'll be neutral on that issue.

As for the rest of RM-11625 concerning Examination Credit, Credit for expired licenses, CSCE's, Grace Periods, changes to the Vanity Call system, the number of VEs required for testing. First and foremost, why change a system that works (?) to accommodate a very few that think the system is too restrictive. The present rules have served the FCC and the Amateur Community well.

I see no reason to extend lifetime credit for exams taken in the past, whether that be 52 years or 12 years. I do agree it seems illogical that just because I remember to renew my license I have in some way retained the knowledge I learned for my exam. I would venture a presumption that most licenses that don't renew on time, or have completely overlooked the process for the 2 years grace period, probably 'were not' using their amateur license and/or keeping 'up to date'. Here's one example, say a person was licensed 22 ago, he used his license for a while then went inactive, he renewed after the first 10 years, but during the next 10 years he forgot all about Ham Radio, forgetting to renew. Let's face the facts, 20 years ago there was CW, more than 3 license classes, plus many other changes which he wouldn't have the slightest idea about. In short he should be retested to 'come up to speed'.

There is little evidence that inactive amateur's, or for that matter inactive brain surgeons would retain the necessary skills to “just” step back up to the plate. Times change, rules change, asleep at the switch isn't a good reason, it's an excuse! If retesting and the minor cost is such a hardship as to discourage “former amateur operators to become involved again”, quite honestly sorry, but who needs them. If they had been involved, they'd have been on top of the renewal process.

Personally I would recommend retesting everyone every 10 years, I'm sure it would help the FCC get all those 'dead' Novice licenses off the books, but that's not the question? Therefore, I would give NO credit for expired licenses.

The same goes for CSCE's, they should become useless paper the day the “real” license is received in the mail. CSCE is should only be a temporary authority of privileges, between the test session and receipt of the “hard copy” license. Once the license is in hand, the license extends all element credit for upgrades. This wasn't totally true when CW was part of the license requirements.

As for the vanity call waiting period, I see no persuasive reason to rush the process, two years give the families time to react and a nice cooling off period for the call sign.

To clarify my position, I recommend NO changes to the present rules that pertain to Examination Credit, Credit for expired licenses, validity of CSCE's, Grace Periods, and the Vanity Call system, or the number of VEs required for testing. As for remote testing, it appears the system can and does accommodate the need when it exists.

Again NO changes are needed to a system that's working fine for 99.99+ percent of the amateur population.

Thank you and thanks to a government system that allows me to comment and hopefully influence the process. If the FCC would like any clarifications on my statements, I'm always available either on the telephone, via email or by written correspondences.
Signed by , John Wilson, 16 November 2012, Celebrating 50 years as an active and informed licensed Amateur.