

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

IN THE MATTER OF
AMENDMENT OF THE AMATEUR SERVICE RULES
GOVERNING QUALIFYING EXAMINATION SYSTEMS AND
OTHER MATTERS
AMENDMENT OF PART 97 OF THE COMMISSION'S
AMATEUR SERVICE RULES TO GIVE PERMANENT CREDIT
FOR EXAMINATION ELEMENTS PASSED
AMENDMENT OF PART 97 OF THE 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
AMENDMENT OF THE AMATEUR SERVICE RULES
GOVERNING VANITY AND CLUB STATION CALL SIGNS

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RESPONSE TO NOTICE OF PROPOSED RULE MAKING AND ORDER

Richard A. Golden (Golden) responds to the above and addresses the proposed change to Section 97.21(b). That section now provides that a person whose amateur station license grant has expired may still apply for renewal of the license during a two-year grace period, and it proposes to shorten the time period to 180 days.

Golden has been licensed as an amateur radio operator since 1958 and has observed that many individuals will allow their licenses to lapse without making an application for renewal before a license expiration date. The reasons for such a lapse vary, but because of the unique nature of the amateur service such individuals may in many instances be totally unaware¹ to an imminent threat of a loss of a right to be a licensee. This problem is compounded because a two-year grace period has existed for more than a half a century. Many licensees who will believe that they are entitled to renew perfunctorily during a two-year grace period will not learn of the rule's change until it is too late for them to renew. If faced with additional administrative burdens for re-licensing, many individuals will simply not bother to do so.

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In suggesting the proposed changes, what is being overlooked is that the public interest (as compared to the interests of particular individuals who may be affected) is best served by maintaining a structure that best assures that the maximum number qualified persons will be licensees in the amateur radio service.

The two-year grace period should be retained.

Dated: November 15, 2012.

/s/ Richard A. Golden

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¹ The existence of private renewal information services, for the most part, may not provide adequate notice to for those licenses adversely affected by the proposed rule change.