

I am an Extra Class radio amateur (licensed in 1988) and also hold three FCC commercial licenses.

The Commission proposes to reduce the waiting period for reassignment of vanity call signs from two years to six months.

In many cases, six months would not allow sufficient time for a close relative of a deceased licensee to obtain the same class of license as the deceased held, in order to be eligible to hold the deceased's former call sign. A six-month waiting period therefore would defeat one of the most popular features of the vanity call sign system: the transfer of a call sign from a deceased parent to their child or other close relative.

In its current proposal, the Commission has correctly reasoned that "there is no practical reason why the waiting period could not be longer than the grace period."

For these reasons, I believe that the waiting period for reassignment of vanity call signs should not be changed. It should remain as two years.

Respectfully,
Philip Mulivor WW2E