



Amateur Radio Club and American Radio Relay League (ARRL) VEC programs. I have held my Amateur Extra Class license, KC8MVW, since 2001 after obtaining my initial license in 1999. I am also a life member of the ARRL and active in the local ARES group.

### **General Comments on WT docket 12-283**

I am generally in favor of these actions; however I would like to comment on certain parts of the proposal. I do have objections to certain portions of the proposed rulemaking and these objections are detailed below. If an item is not discussed, then I do not have objections with it as it is proposed.

### **Comments on Granting Examination Credit for Expired Amateur Licenses**

#### **Qualification of Applicants**

An applicant needs to show adequate proof of previously having an amateur radio license and of their identity. This may include previous tax records showing change of address as well as copies, if not the original, of their expired amateur license. In absence of their actual license, easily verifiable information, such as a call book publication could be utilized to ascertain their claim. If the applicant cannot provide proper proof or document trail for address relocations, then they should be required to obtain proof of having held a license previously from the FCC (or other qualified agency or supplier) as currently utilized when a person is claiming element credit for an expired Technician Class license

when requesting an upgrade to General Class under provision 47 C.F.R § 97.505(a)(4) and 47 C.F.R. § 97.501(b),(c) of the current rules, but no longer has a physical license to present.

The fact that an applicant is required to fill out and sign a new application form that contains various certifications including the statement that the information he or she is providing is both true and correct will provide a legal basis for enforcement action should it become necessary. Any attempt to obtain a license by fraudulent means is a federal offense, and there are already appropriate penalties for such actions. Any unqualified person would soon reveal themselves by their actions to other local amateur radio licensees as part of the “self-policing” tradition of the amateur radio service who would then report said discrepancy to the appropriate authorities.

### **Grace Period for Renewal of Licenses**

Reduction of the current two-year grace period for renewal is appropriate if, and only if, the proposal to allow permanent element credit is enacted. Expanding the grace period for a longer period, albeit anything greater than 2 years could be a problem. There will always be an applicant that is “just outside” the window of opportunity and feel discriminated against. The simplest solution is always the best, and allowing permanent element credit removes any ambiguities. Also, shortening the grace period makes it easier to purge the license database of deceased individuals, or those that have decided to permanently discontinue their amateur radio activities, either of which would likely be an issue with the

proposed extended grace period for renewal. Allowing permanent element credit solves several problems, and creates no new difficulties.

The grace period for renewal could be the same as the interval for call sign reassignment. Currently at 2 years, this interval seems both appropriate and prudent.

### **Credit for CSCE forms**

I believe that the time limit for the CSCE should be until the actual license arrives from the FCC (typically within a month), the applicant's information is in the official ULS database (typically within a week of examination) or 365 days, whichever comes first. As the CSCE forms are currently stored for 18 months from examination date, extending this timeline would cause additional hardship for the VE officials who store these records. Currently, once an applicant has their actual license, the CSCE is an unnecessary piece of paper.

There should be no instances where a CSCE was issued that does not correspond with an actual license document being produced now that the code-free licensing has been implemented.

### **Issues concerning the number of volunteer examiners required and remote testing**

I do not support the idea of reducing the number of examiners from three (3) to two (2).

The exam sessions are already busy enough and reducing the number of examiners would cause even more issues with both properly observing the test session and filling out the necessary paperwork for the successful applicants. As one person is filling out the paperwork, or grading the exam; the other two can observe the session to ensure proper test integrity procedures are being followed.

The possibility of remote testing opens up new questions. One of the primary reasons for considering remote testing of applicants is when the applicant cannot get to a regular test session due to economic or other conditions. A prime example of this would be applicants in the remote villages of Alaska where getting a team of examiners to them or the applicants to a larger city where a regular session is held could run into the hundreds of dollars just for transportation. Weather delays could extend that visit for up to a week or longer.

Any remote session needs to be monitored by real time video links being viewed by all three VE's. This means a high speed internet accessible location, typically the local school district library or office building. There should also be an onsite test administrator or proctor; preferably a licensed amateur, to monitor the session to ensure that there are no testing discrepancies.

If a licensed amateur operator is not available to assist proctor the remote session; certified Volunteer Examiner or not, another individual needs to be permitted to proctor this

session. The same rules for the VE program needs to be in effect for the proposed individual, ie, not an immediate relative or in-law. This proposed individual needs to be further designated as a responsible individual as follows: (1) A military officer of U.S. Army Captain or higher grade (or equivalent rank in any of the other U.S. armed services), or (2) A sworn municipal peace officer or Alaska State Trooper, or any other sworn State or Federal public law enforcement officer, or (3) A local school administrator, such as a principal. Even with a local proctor that is not a certified VE, there shall still be three (3) certified VE's monitoring the session remotely via live video and audio links. These VE's will be those that grade the completed examinations and issue the associated CSCE forms.

I do not agree that at least one certified VE needs to be physically at the remote test session per the above discussion. With adequate safeguards, such a restriction will be an unnecessary impediment to the remote testing process. If a VE is available, then they should be onsite to monitor and manage the session; while three other VE's conduct the grading and paperwork issuance process. The lack of a certified VE should not be a blockade to any individual wishing to obtain their license through remote testing.

A physical distance to a testing location, particularly those of 200 miles or more, one way, where year-round maintained roads do not exist, should be considered the same way as any other physical difficulty and dealt with as such. Each of these difficulties have been properly handled by the individual VEC administration groups in the past and should be permitted to continue that process.

Respectfully submitted by:

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