

**Before the
Federal Communications Commission
Washington DC 20554**

In the matter of)
)
Amendment of the Amateur Service Rules) WT Docket No. 12-283
Governing Qualifying Examination Systems)
and Other Matters)

To the commission:

Comments of Robert P McCormick, WIQA

Introduction

I hold an Amateur Extra class license and have been licensed in excess of 40 years. I am also an accredited volunteer examiner since the program began. I have been active in numerous local and regional amateur radio organizations holding various offices and board positions. I also was a volunteer sorter for the incoming ARRL W1 QSL bureau.

Credit for Expired Licenses

I am against the granting of previous license holders credit for current examination elements without some consideration for the length of time a license has been expired.

Question pools are currently reviewed and updated on a four year rotation. These updates include adjustments for Part 97 revisions, advances in technology, changes in operating practices, etc. The premise here is that someone who has previously passed an element (no matter how long ago) by virtue of passing that element should be able to pass the current element. While I agree that may hold true for some sections of an exam element I believe someone who has chosen not to renew their license is no more likely qualified than an examination candidate who is previously unlicensed.

I would propose any revisions to Section 97.505 that includes credit for former license holders should be limited to no more than five (5) years past the license's expiry date.

I believe in lieu of granting examination credit for expired licenses the Commission may be able to accomplish a similar result by instead extending the grace period where a licensee is allowed to request reissuance of their expired license.

Documentation or Safeguards

The Commission questions what documentation or safeguards should be required in order to prevent anyone from fraudulently obtaining a new license. As a volunteer examiner I would be somewhat weary of having the responsibility to authenticate both old license documents as well as determine whether a document presented is in fact one that was issued to an examinant.

This would be even more of a concern when the original document is not available (e.g., only a copy is presented).

There would also be no way for a VE team to know whether any license presented to them had been subsequently revoked or modified by the FCC. Extra procedures would therefore have to be instituted (incurring additional time and cost) at the VEC and FCC level to ensure an applicant is not granted undue credit.

By limiting the number of years an expired license could be utilised for examination credit VEC's may be able to use the ULS and other FCC resources to research previous license grants including administrative actions, change of address, etc. If there were no limit imposed then licenses that were issued decades ago would be difficult to authenticate as they are not represented in currently accessible on-line systems.

Even though on-line authentication of recent license grants in the ULS system could be accomplished it is not reasonable to assume this could be done at a VE session.

Time and Expense Resources

It was mentioned that granting examination credit for expired license holders would reduce the time and costs associated with the candidate's reacquiring a Commission's license. I have to question whether the additional time and costs incurred by the VEC's (and possibly the FCC) in authenticating documents is worth the individual's savings. The most cost and time effective solution is for licensees to renew their licenses either on-line or postal submission of Form 605.

Validity of CSCEs

I am against granting holders of a CSCE lifetime element credit. Whether an examinee actually obtains a license or only holds a CSCE indicating a passing score on one or more elements the issue is the same: over time some aspects of an element's exam do change as noted above.

The premise here is that someone who has previously passed an exam element (no matter how long ago) should be able to pass the current element. While I agree that may hold true for some sections of an exam element I believe someone who holds a dated CSCE is no more likely qualified than any other candidate who may present themselves at an exam session.

I would support the extension of the validity period of a CSCE beyond the current one year expiry. I would propose that such extension should be for not more than five (5) years past the examination date. The Commission may also want to consider whether such extension of CSCEs beyond the current 365 day expiration should be retroactive for previously issued CSCEs as CSCEs typically have the 365 day limitation printed thereon.

Whilst the CSCE provides both proof of passing an examination element as well as temporary operating authority for existing FCC licensees I don't find that it would be anomalous or confusing to create a difference in the validity of the credit for elements passed and the upgrade authority. While said operating authority is for up to 365 days from the examination date realistically the actual amount of time it takes for the session results to be processed by the VEC and updated in the FCC's ULS system is minimal. All licensees can query the Commission's ULS and obtain a duplicate copy of their upgraded license as soon as it has been processed.

Grace Period for Renewal

The Commission notes that the principal reason for providing the grace period is to allow amateur licensees to restore their operating privileges without sitting for reexamination.

Based on other proposed changes to Section 97 it is suggested that the grace period be reduced from two (2) years to six months (180 days).

I believe that the shorting of the grace period is not in the overall best interest of licensees as well as the VEC organizations. I personally know a number of people who failed to remember their license renewal date and had to utilize the grace period to restore their operating privileges. In one case I know of someone who actually went unknowingly beyond the 2-year grace period which resulted in the loss of their callsign.

By shortening the grace period and granting examination credit for expired license elements individuals will be forced to attend an exam session and incur fees to reinstate their licenses. VEC's will also experience an increase in volume and associated overhead.

As an alternative the Commission may be able to accomplish similar results by changing the grace period from two years to five years (or some other timeframe deemed acceptable by the Commission).

This would allow the previous license holder to request reissuance of their expired license as is done now (within the grace period). Benefits would include:

the previous license holder can accomplish this on-line and does not need to attend a VE session or incur other fees; VE teams and the VEC would not need to handle the additional burden of authentication of documents used for exam credits; elimination of possible abuse of the system with fraudulent documents or licenses that have been modified or revoked by the FCC.

Vanity Call Sign Waiting Period

By virtue of shortening or eliminating the renewal grace period it would make it possible to shorten the waiting period for vanity call signs associated with cancelled licenses. This could adversely affect the volunteer QSL bureau efforts. Amateur radio operators often exchange QSL cards with other operators to confirm contacts. QSL cards are subsequently used for various operator achievement awards.

To reduce the costs of sending cards internationally a system of national QSL bureaus have been established. These are staffed by volunteers who receive and sort cards by call signs. It is not uncommon for foreign cards to take six months to a year to be received by the destination station. The current 2-year grace period before a call sign is reissued provides for a reasonable buffer between uses of the call sign. If this timeframe were to be shortened in some circumstances it could significantly burden the QSL bureau volunteers. To wit: if an holder of a call sign was very active making thousands of contacts per year were to pass away the Commission would be notified and the license would be cancelled. The QSL bureau would then return cards to senders noting the operator was deceased. If the deceased's callsign were to be reissued to someone else six months later it is likely that cards for both operators would be received which would require additional sorting (by looking at additional information on the QSL cards) to determine which holder of the callsign the card is destined for. A minimum of a one year period before a call sign was reissued would help minimize QSL bureau impact.

Shorting the grace period and therefore the timeframe for when a call could be reissued would also result in someone who neglects to renew his/her license from likely getting their call sign back if they held one of the more desirable shorter (Amateur Extra class group) call signs. Whilst I don't condone one's neglect in renewing their license if the Commission feels that a grace period is within reason I would maintain that a call sign is as valuable as the authority granted by the Commission's license: more often than not operators are known by their first name and call – and the loss of a call would also be the loss of one's identity.

One opposing argument about extending the grace period may be that highly desired call signs would not become available. My opinion is that holders of the more desirable call signs are more likely to renew their licenses (surely the Commission could easily generate reports proving that theory). For deceased license holders there is already a process in place whereby anyone can submit notice of death to the Commission to have action taken on the license (which then starts the timer after the license is cancelled). I would recommend the Commission consider making a previously issued call sign available no less than one year after the license is cancelled.

Number of VEs

The Commission proposes to reduce the number of VEs at an exam session from three to two. While I generally support the reduction of VEs I would recommend that the Commission consider the reduction in VEs for examination session be applicable for those sessions with a relatively small number of examinees. While I agree that over the last few decades the VEC processes and procedures have been streamlined there is still a lot of work VEs must do at the exam session. Therefore for larger sessions I would recommend the current three VEs still be required. (In my experience many exam sessions have more than three VEs assisting.)

The reduction in VEs will help not only support exam sessions in the more remote areas of the United States but also with sessions administered elsewhere in the world. While this would have the benefit of supporting US expatriates in obtaining or upgrading Commission licenses it may also increase the number of foreign nationals doing the same. The latter will result in an increased demand for the most desired call signs in the Amateur Extra class systematically assigned and vanity call sign blocks.

Remote Testing

I support the modification of Section 97.509(c) to allow the use of remote monitoring or other methodology for the administration of examination elements. I believe the administration of the exam elements should be overseen on-site by at least one impartial, unrelated individual whether the exams are given in paper or electronic form. I believe this is necessary to ensure the integrity of the examination process. This individual could be an accredited VE or possibly someone else whose credentials would be acceptable to the VEC processing the exam session. To wit: a notary public, ranking military officer, judge or officer of a court, etc. Whilst VEs currently are also licensed Amateur Radio officers for the purpose of remotely administering an exam session I don't believe that having a Part 97 license provides any benefit for ensuring the integrity of a remotely administered session.

While I believe that today remote testing should be limited to those locations or circumstances where traditional exam session would be cost prohibitive or logistically difficult to arrange in the future it is possible that remote testing sessions could become more prevalent. To that extent I would recommend the Commission not necessarily define when and where remote testing sessions could be utilized but instead leave that to the discretion of the VECs.

Another alternative the Commission may want to consider is allowing the VECs to work with organisations who administer other professional exams. Many professional exams are administered by computer based testing and overseen by professionals who monitor exam sessions. Allowing a VEC to consider implementing testing sessions through these alternative means may increase the opportunities for individuals to obtain an Amateur Radio license.

Emission Types

I support the Commission's proposal to modify the Part 97 emission types allowed on amateur frequencies. Many Part 97 licensees work with equipment that fall under other FCC jurisdiction that can easily be adapted for the Amateur service. In general it would be desirable to allow emissions available to other services in the Amateur Radio service as well.