

There is no need to modify the Amateur Radio Service rules to grant lifetime credit for an expired license. While an operator who maintains their license, but does not use it, is just as likely to be behind the technology curve as the operator who allows the license to expire, they at least had enough interest in the service to maintain their license by renewing it. Allowing people to reclaim an expired license because they had one many years ago is rewarding bad behavior. It's not difficult to renew a license given the options available for doing so. Two years is sufficient time to decide whether they wish to renew their license.

In addition, there would be a huge burden placed on Volunteer Examiners to verify an applicant has credit towards a particular license. When the rules were changed to allow pre-1987 Technicians to be upgraded to General without further examination, the substantiating records only needed to go back a fixed period of time. This proposal will open the door for going back decades. Without an applicant maintaining possession of the expired license or Certificates of Successful Examination, there is almost no way to prove the applicant actually held a license. A name in a callbook will not help in the case of a common name. An examiner has no way to prove the applicant in front of them is the same person with the same name listed in the callbook or whatever record they may have.

The proposal to reduce the number of examiners to two degrades the integrity of the volunteer examination process. If an examiner wishes to commit fraud by allowing an unqualified applicant to pass an exam, it is more difficult to persuade two more people than just one. While it may be difficult to assemble three volunteer examiners in some parts of the US or in other parts of the world, there is always an option to use technology such as webcams to allow the third examiner to monitor the session remotely. It's been proven to work.

General, Advanced and Extra Class licensees are all allowed to be volunteer examiners, so there is a very large pool of amateur licensees available. In areas where there are not many examiners, the answer is to encourage more people to become examiners. While the credentialing process may vary between coordinators, it's not that hard. Examination opportunities are far more available than when the FCC traveled to a few cities periodically.

One of the purposes of the Amateur Radio Service is experimentation. Allowing amateur radio operators to use some of the technology available to commercial users will encourage experimentation and possibly more efficient use of the spectrum.